

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW  
YORK

18 CV 12233

SHEILA  
ROBINSON

PLAINTIFF

VS  
DEFENDANTS

1. LARRY PAGE
2. SERGEY BRIN
3. MARK ZUCKERBERG
4. DAVID FILO
5. JERRY YANG
6. MAISSA MAYER
7. HANS VESTBERG
8. JEFF BEZIO
9. SATYA NADELLA
10. BRAD SMITH
11. GABRIEL WEINBERG
12. CEO (DOGPILE)
13. DEVIN WENG
14. PIERRE OMIDYAN
15. TIM ARMSTRONG
16. BEN SILBERMAN
17. JOEY LEVIN
18. JOANE WISON
19. FRED WILSON
20. AMY CHESHIRE
21. DAVE WECHSLER
22. JASON APFEL
23. LLOYD PARKS
24. MICHAEL LOGAN
25. GRES MAFFEI
26. JOHN MALONE
27. AJAY SINGH
28. LEX WEXNER
29. DAVID MCCONNELL
30. KIM KARDASHIAN WEST -ADDRESS UNKNOWN
31. KYLE KARDASHIAN
32. DOUGLAS MCMILLION
33. KANYE WEST

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*MOTION FOR PERMANENT /PRELIMINARY /TEMPORARY / STALKING INJUNCTION- <b>SEPARATE</b>	

### **Introduction**

- 1.This is a complex RICO claim alledging violation of 18 USC 1962 (a)(b)(c)(d) brought by plaintiff against all named defendants arising from a complex widespread schemes to defraud plaintiff and plaintiffs brand company or companies and brand product lines in a pattern of predicate acts in violation of extortion under the hobbs act 1954 and RICO
2. The schemes were based on the defendants organizing as a organization and using their organization and business as a crimial enterprise to target, stalk,and defraud plaintiff and plaintiffs brand company and or companies

### **Jurisdiction and Venue**

This court has subject matter jurisdiction over this action pursuant to 18 USC1964.Venue is proper in this judicial district pursuant to 18 USC1965(b) .

### **Standing**

Plaintiff resides in New York since 1975,Plaintiff started ,named, formed companies in 1997,2013,2016,2018 in New York ,Plaintiffs 's company/ business was injured /damaged by named defendants by reason of RICO violation 1962(a)(b)(c)(d) targeting plaintiffs companies in New York

### **Statue Of Limitations**

Plaintiff did not discover the fact of company /business was being intentionally targeted by the named defendants until 2015. The named defendants were suppose to be accredited , and reputable ,no warning from any goverment or law agency or news organization notified- broadcasted plaintiff or other companies or buinesses that named defendants were operating a criminal pozzi like enterprise intentionally diverting revenue from online companies causing financial loss to companies and bringing financial gain to themselves. Plaintiff had limited computer skills and could not have discovered these facts despite its exercise of reasonable diligence

### **Injuries /Damages**

- 1.Loss in profits and revenue as other brand companies
- 2.Corrective Advertising
- 3.Relocation Cost
- 4.Unpaid/ royalties
5. Reputation and Goodwill
6. **TOTAL DAMAGES \$ 91.450,000,000 BILLION DOLLARS**

### **Cause of Action**

1. RICO VIOLATIONS 1962 (a)(b)(c)(d)
2. common law trademark infringement under the Lanham act 43 (a) 1125
3. Unfair trade practices under the laham act 43( a)1125
4. Cybersquatting under the laham act 43 (a)1125
5. False designation of origin under the laham act 43(a)1125
5. Cyberstalking /Stalking 2261(a) (b)
6. Extortion under the hobbs act 18 USC 1954
7. unfair competition under the laham act 43 (a) 1125
8. Racketeering activity / Predicate acts 1961 (5)

## **PREDICATE ACTS**

1. CYBERSTALKING /STALKING - 2261A-B
2. COMPUTER FRAUD - 18 USC 1029 ,1030 (a)(7)
3. WIRE FRAUD - 18 USC 1343
4. MAIL FRAUD 18USC 1341
5. SCHEME TO DEFRAUD -18 USC 1346
6. EXTORTION UNDER THE HOBBS ACT -18USC 1959
7. TRAFFICING IN COUNTERFEIT GOODS 18USC 2320
8. INTERFERENCE IN INTERSTATE AND FOREIGN COMMERCE 18 USC 1951
9. CYBERSQUATTING
10. EMBEZZLEMENT
11. MURDER FOR HIRE
12. BRIBERY 18 USC 201
13. RETALIATION -18USC1513
- 14.AIDING AND AIBETTING
- 15.RACKETEERING 1961
16. ECONOMIC ESPIONAGE 18 USC 1831
17. HATE CRIME
18. DEPRIVATION OF RIGHTS 18USC 241-242

**COUNT I**

.....Income Derived from a pattern of Racketeering  
Activity .. or through the  
collection of a unlawful dept: .....18  
U.S.C. 1961 (5), 1962 (a)

- .....
1. The allegations of paragraph 1 through 2 are documentary materials incorporated herein by reference.
  2. The allegations of paragraph 1 through 25 in plaintiffs Case Statement are documentary materials incorporated herein by reference
  3. The COUNT I is against all defendants named ,except and excluding defendants of COUNT (c),(d)
  4. At various times and places efendants received income from a pattern of racketeering activity and/or through a collection of an unlawful dept,directly or indirectly
  5. During the past 10 years, all defendants did cooperate jointly and severally in the commission of two(2) or more of the predicate acts itemized at 18 U.S.C. 1961 (1) in violation of 18 U.S.C.1962 (a)
  6. All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity,a continuing threat of their respective racketeering activities,in violation of the RICO law 18 U.S.C.1962 (a)
  7. As a direct and proximate result of the count I defendant racketeering activities and violations of 18 U.S.C 1962(a) plaintiff have been injured in their business +property. ....
- WHEREFORE ,plaintiff request that this court enter judgement against the count I defendant as follows (.SEE RELIEF REQUESTED ) ...

## 11

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10. WHEREFORE -Plaintiff request that this court enter judgement against the COUNT II defendants as follows ( SEE RELIEF REQUESTED )

**.COUNT**

**.....III**

Conduct and participation in a RICO Enterprise  
through a Pattern of Racketeering Activity:  
18 U.S.C. 1961(5) 1962 (c)

1. The allegations of paragraphs 1 through 2 are documentary materials incorporated here in by reference.
2. The allegations of paragraph 1 through 25 in Plaintiffs Case Statement are documentary materials incorporated herein by reference
- 3 This COUNT III is against all defendants
- 4 Named defendants is a enterprise engaged in and whose activities affect interstate and foreign commerce. The count III defendants are employed by or associated with the enterprise.
5. The COUNT III defendants agreed to and did and conduct and participate in the conduct of the enterprises affairs through a pattern of racketeering activity and for the unlawful purpose
6. At various times and places enumerated in plaintiffs documentary material, all defendants did associate with a RICO enterprise of individuals who were associated in fact and who engaged in, and whose activities did affect, interstate and foreign commerce. All defendants did conduct and /or participate either directly or indirectly, in the conduct of the affairs of said RICO enterprise through a pattern of racketeering activity in violation of 18 U.S.C. 1961 (5), 1962 (c)
7. During the ten years, all defendants did cooperate jointly and severally in the ..commission of two or more of the predicate acts itemized at 18 U.S.C. 1961(1) in violation of 18 U.S.C. 1962 (c)
8. All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten a continuity, a continuing ... ..threat of their respective racketeering activities, in violation of the RICO law 18 U.S.C. 1962 (c)
- 9 The count III defendants have directly and indirectly conducted and participated in the conduct of the enterprises affairs through the pattern of racketeering and activity described above in violation of 18 U.S.C. 1962 (c)
10. As a direct and proximate result of the count III defendants racketeering activities and violations of 18 U.S.C. 1962 (c) plaintiff have been injured in their business.

.....  
..... WHEREFORE -Plaintiff request that this court enter  
judgement against the count III defendants as follows ( SEE X-----)



### **COUNT IV**

..... Conspiracy to Engage in a  
.....pattern of Racketeering Activity :  
.....18 U.S.C. 1961 (5) 1962

(d)

- 1.The allegations of paragraph 1through 2 are documentary materials incorporated here in by reference
- 2.The allegations of paragraphs 1 through 25 in Plaintiffs Case Statement are documentary materials incorporated herein by reference.
- 2.This COUNT IV is against all named defendants
3. At various times and places partially enumerated in plaintiffs documentary material all defendants conspired to receive income derived,directly or indirectly from a pattern of racketeering activity ,or through collection of an unlawful debt in which such persons has participated which is engaged in or the activities affect interstate or foreign commerce in violation of 18 USC 1962 (a) (d)
- 4..At various times and places partially enumerated in Plaintiffs documentary material, all defendants did conspire to acquire and maintain an interest in a RICO enterprise engaged in a pattern of racketeering,in violation of 18 U.S.C.1962 (b)(d) 5 At various times and places partially enumerated in plaintiffs documentary material all defendants did also conspire to conduct and participate in said RICO enterprise through a pattern of racketeering activity in violation of 1962 (c) (d)
- 6.During the ten years,all defendants did cooperte jointly and severally in the commission of two (2) or more of the predicate acts itemized at 18 U.S.C. 1961 (1) in violation of 1962 (d)
7. All defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten a continuity ,a continuing threat of their respective racketeering activities,in violation of the RICO law 1962 (d)
8. As a direct and proximate result of the count IV defendants conspiracy,the overt acts taken in furtherance of that conspiracy ,and violation of 18 U.S.C. 1962 (d) plaintiff have been injured in their business and property in that

.....  
WHEREFORE ,plaintiff requests that this court enter judgement against the COUNT IV defendants as follows ( SEE RELIEF REQUESTED)

.....  
**PLAINTIFF DEMAND TRIAL BY JURY**

## RELIEF REQUESTED

.....WHEREFORE,pursuant to the staues at 18 U.C.C.1964(a))(c)  
Plaintiff requests judgment against all defendants as  
follows:

### ....ON COUT ONE

- 1.That this court liberally construe the RICO laws and thereby find that all defendants ,both jointly and severly,has received income derived from a pattern of racketeering activity or through a collection of an unlawful dept,used such income ,in acquisition or interests,or the establishment or operation of a enterprise engaged in,and whose activities did affect interstate and foreign commerce in violation of 1962(a)
- 2.That all defendants and all their directors,officers,employees,agents,servants and all other persons in active concert or in participation with them,be enjoined temporarily during pendency of this action ,and permantly thereafter,from aquiring or maintaining ,whether directly or indirectly,any interest or control of any RICO enterprise of persons,or of other individuals associated in fact,who are engaged in,orwhose activities do affect,interstate or foreign commerce.
- 3.That all defendants and all of their directors,officers,employees,agents,servants and all other persons in active concert or in participation with them ,be enjoined temporarily during pendency of this action,and permantly thereafter,from committing any more predicate acts in furtherance of of the RICO enterprise alledged in COUNT ONE
- 4.That all defendants be required to account for all gains,profits,and advantages derived from their several acts of racketeering in violation of 18 USC 1962(a).
- 5 That judgment be entered for plaintiff and against all defendants for plaintiffs actual damages,and for any gains,profits,or advantages attributable to all violations of18 USC1962 (a)
- 6.That all defendants pay to the plaintiff triple damages ,under authority of 18 USC 1964 (c)
7. That all plaintiffs pay to the plaintiff cost of the lawsuit incurred herein including ,but not limited to, all necessary research, private investigations,expert witnesses,travel expenses,all non judicial enforcement and all reasonable pro se fee's at \$500 dollars @ 10 hours 6days per week ,.worked on at start of this action from 2015.,and other counsel fee's, detailed in summary of damages list
8. A permanent injunction from all defendants frompromoting,advertising,soliciting, manufacturing,selling,or using any of as of /similar plaintiffs named companies brand name or company product lines in commerce.
- 9.That named defendants destroy any and all products manufactured and cloned ,similar,of plaintiffs companies brand identity.
10. That named defendants except defendants that have lived and resided in upstate new york prior to 2013 not ever relocate any,business or resident property in upstate New York where plaintiff lives resides and does business,or their property forfeits to plaintiff .
- 11..That named defendants except defendants that resided prior 2013 forfeit any property aquired in upstate new york to plaintiff.

12. That named search engine defendants remove all named cyber squatted and infringing domains from their computer servers permanently.
13. That all domain registrars cancel all of the cyber squatted infringing domains of plaintiffs company's and companies product lines identity..
14. That all search engine defendants remove the search pages created of plaintiffs company identities, product line identities from their computer servers permanently
15. That search engine defendants cease and desist, soliciting any marketing, sells, advertising, affiliation, of any of plaintiffs companies, or plaintiffs companies product lines permanently, and remove the hundreds to thousands to millions of other businesses from their computer servers in the online search for plaintiffs companies permanently.
16. That named defendants disclose any shell companies, business interest, investments, of similar, cloned names of plaintiffs companies brand names, or product lines and forfeit it to the plaintiff.
17. That all named defendants be banned from buying any stock in plaintiffs public companies or possible public companies, or investing in any of plaintiffs companies.
18. That all named defendants pay relocation costs of plaintiffs business/home.
19. That all defendants pay the cost of loss profits and revenue/ unpaid royalties/in injunction relief /and other costs detailed in-list of summary of damages
20. That all the trademarks registered by defendants as of /and /of of plaintiffs companies brand identities and product line identities be canceled.
21. That all defendants pay the cost of manufacturing and corrective nationwide advertising relaunching costs of plaintiffs companies brands and product lines to the original designation of origin
22. A permanent injunction to all defendants from contacting any of plaintiffs manufacturers and suppliers or interfering with interstate or foreign commerce to any of plaintiffs companies or companies product lines
23. A EX PARTE SEIZURE. That HOMELAND SECURITY enforce the intellectual property rights of plaintiffs companies ; GORGEOUS JEANS INTERNATIONAL TM , INSIDE LIMOS CLOTHING TM, HERE-DEAR INTERNATIONAL TM, FRANKIE SALLY INTERNATIONAL TM , CHUONG OO CHOOSE INTERNATIONAL TM, that consists of product lines; STREETCLOTHES INCLUDING DENIM JEANS AND T-SHIRTS, FOOTWEAR, FRAGRANCES, COSMETICS, FOOD PRODUCTS, MAGAZINES, SWIMWEAR INCLUDING BOARD SHORTS, BEER, LIQUOR AND WINES, BEVERAGES, JEWELRY INCLUDING WATCHES, CERTAIN STATIONERY PRODUCTS, CERTAIN TOY PRODUCTS, BIKES, that could generate plaintiff and plaintiffs companies \$billions to \$trillions of dollars.. (SEE EXPERT WITNESSES AND DISPOSITIONS )

## **ON COUNT TWO**

.....1. That this court liberally construe the RICO laws and thereby find that all defendants both jointly and severally, have acquired and maintained, both directly and indirectly, an interest in and/or control of a RICO enterprise of persons and of other individuals who were associated in fact, all of whom engaged in, and whose activities did affect, interstate and foreign commerce in violation of 18 U.S.C. 1962 (b) (prohibited activities)

2. That all defendants and all of their directors, officers, employees, agents, servants and all other persons in active concert or in participation with them, be enjoined temporarily during pendency of this action, and permanently thereafter, from acquiring or maintaining whether directly or indirectly, any interests in or control of any RICO enterprise of persons, or other individuals, associated in fact, who are engaged in, or whose activities do affect, interstate or foreign commerce.

3. That all defendants and all their directors, officers, employees, agents, servants and all other persons in active concert or in participation with them, be enjoined temporarily during pendency of this action, and permanently thereafter, from committing any more predicate acts in furtherance of the RICO enterprise alleged in COUNT TWO

4. That all defendants be required to account for all gains, profits, and advantages derived from their several acts of racketeering activity in violation of 18 U.S.C. 1962 (b)

5. That judgement be entered for plaintiff and against all defendants for plaintiffs actual damages, and for any gains, profits, or advantages, attributable to all violations of 18 U.S.C. 1962 (b)

6. That all defendants pay to plaintiff triple damages under authority of 18 U.S.C. 1964 (c)

7. That all defendants pay to plaintiff costs of the lawsuit, incurred herein including but not limited to all necessary research, investigations, experts, all non judicial enforcement and all reasonable pro se fee's at \$500 per hour at 10 hours per day since 2015-2018, detailed in summary of damages list

8. A permanent injunction from all defendants from promoting, advertising, soliciting, manufacturing, selling, or using any of/as of /similar of /cloned as plaintiffs named companies brand name or company product lines in commerce

9. That named defendants destroy any and all products manufactured and cloned, similar, of plaintiffs companies brand identity

10. That named defendants except defendants that have lived and resided in upstate new york prior to 2013 not ever relocate any business or residential property in upstate new york where plaintiff lives and resides and does business, or their property forfeits to plaintiff.

11. That named defendants except defendants that resided prior 2013 forfeit any property acquired in upstate new york to plaintiff

12. That named search engine defendants remove all named cyber squatted and infringing domains from their computer servers

13 That all named domain registra's cancel all of the cyber squatted infringing domains of plaintiffs company's and companies product lines identity

14. That all named search engine defendants remove the search pages created of plaintiffs company identities ,product line identities from their computer servers permantly

15. That search engine defendants cease and de cease ,soliciting any marketing,sells advertising,affiliation,of any of plaintiffs companies,or plaintiffs companies product lines permantly,and remove the hundres to thousands to millions of businesses of other businesses from their computer servers in the online search for plaintiffs companies product lines permantly,and remove the hundreds to thousands to millions of other businesses from their computer servers in the online search for plaintiffs companies permantly.

16. That named ,defendants disclose any shell companies ,business interests ,investments,of similar,cloned names of plaintiffs companies brand names,or product lines and forfeit to the plaintiff

17. That all defendants be banned from buying stocks from any of plaintiffs public companies investing in plaintiffs possible public companies.

18. That all named defendants pay plaintiffs relocation costs of plaintiffs business/home ..

19. That all defendants pay the cost of loss profits and revenue /unpaid royalties/in junction relief /and other costs detailed in list of summary of damages.

20. That all the trademarks registered by defendants as of/and /of of plaintiffs companies brand identities and product line identities be canceled.

21. That all defendants pay the cost of manufacturing and corrective nationwide advertising relaunching costs of plaintiffs companies brands and product lines to the original designation of origin.

22. A permanent injunction to all defendants from contacting any of plaintiffs manufacturers or suppliers or interfering with interstate or foreign commerce to any of plaintiffs companies or companies product lines.

23. A EX PARTE SEIZURE. That HOMELAND SECURITY enforce the intellectual property rights of plaintiffs companies; GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,HERE-DEAR INTERNATIONAL TM,FRANKIE SALLY INTERNATIONAL TM,CHUONG OO CHOOSE INTERNATIONAL TM,that consists of product lines ;STREETCLOTHES-INCLUDING DENIM JEANS AND T-SHIRTS,FOOTWEAR,FRAGRANCES,COSMETICS,FOOD PRODUCTS,MAGAZINES,SWIMWEARINCLUDING BOARD SHORTS,BEER,LIQUOR AND WINES,BEVARAGES,JEWELRY INCLUDING WATCHES,CERTAIN STATIONERY PRODUCTS,CERTAIN TOY PRODUCTS,BIKES,that could generate plaintiff and plaintiffs companies \$billions to \$trillions of dollars ( SEE EXPERT WITNESS AND DISPOSITIONS )



### **ON COUNT THREE**

1. That this court liberally construe the RICO laws and thereby find that all defendants have associated with a RICO enterprise of persons and of other individuals who were associated in fact, all of whom did engage in, and whose activities did affect, interstate and foreign commerce in violation of the RICO law at 18 U.S.C. 1962 (c)
2. That this court liberally construe the RICO law and thereby find that all defendants have conducted and / or participated, directly or indirectly, in the affairs of said RICO enterprises through a pattern of racketeering activity in violation of the RICO laws at 18 U.S.C. 1961 (5) ( pattern defined ) and 1962 (c)
3. That all defendants and all their directors, officers, employees, agents, servants and all other persons in active concert or in participation with them be enjoined temporarily during pendency of this action, and permanently thereafter, from conducting or participating either directly or indirectly from committing any more predicate acts in furtherance of the RICO enterprise alleged in COUNT THREE
4. That all defendants be required to account for all gains, profits, and advantages derived from their several acts of racketeering in violation of 18 U.S.C. 1962 (c)
5. That judgement be entered for plaintiff and all against defendants for plaintiffs actual damages, and for any gains, profits, or advantages attributable to all violations of 18 U.S.C. 1962 (c)
6. That all defendants pay to plaintiff triple damages under authority of 18 U.S.C. 1964 (c)
7. That all defendants pay to the plaintiff cost of the lawsuit incurred herein including, but not limited to, all necessary research, private investigations, expert witnesses, travel expenses, all judicial and non judicial enforcement, and all reasonable pro se fee's at \$500 per hour @ 10 hours 6 days per week, from 2015-2018 and other counsel fee's detailed in list of summary of damages
8. A permanent injunction from all defendants from manufacturing, selling, or using any of plaintiffs companies brand name, or companies brand product lines in commerce.
9. That named defendants destroy any and all products manufactured and cloned, similar of plaintiffs company brands or company brand product lines.
10. That named defendants except defendants that have lived and resided in upstate new york prior to 2013 not ever relocate any business or residential property in upstate new york where plaintiff lives resides and does business or their property forfeits to plaintiff.
11. That named defendants except defendants that resided prior to 2013 forfeit any property acquired in upstate new york. to plaintiff.
12. That named search engine defendants remove all cyber squatted and infringing domains from their computer servers permanently.
13. That all domain registrars cancel all of the cyber squatted domains and named cyber squatted and infringing domains of plaintiffs companies identity, and product line identity.
14. That all search engine defendants remove the search pages created of plaintiffs companies identities, and companies product lines identities. From their computer servers permanently.

15. That search engine defendants cease and desist, soliciting any marketing, sells, advertising, affiliation, of any of plaintiffs companies, or plaintiffs companies product lines and remove the hundreds to thousands to millions of other businesses from their computer servers in the online search for plaintiffs companies permanently.

16. That all named defendants disclose any shell companies, business interest, investments of, similar, cloned names of plaintiffs companies brands, or companies brands product lines and forfeit it to plaintiff.

17. That all named defendants be banned from buying any stocks in plaintiffs public companies or possible public companies or investing in any of plaintiffs companies.

18. That all named defendants pay relocation costs of plaintiffs business/home.

19. That all named defendants pay the cost of lost profits and revenue /unpaid royalties /injunction relief /and other costs detailed in summary of damages list s.

20. That all the trademarks registered of plaintiffs companies brands identities and companies product lines identities by named defendants and /or others be canceled.

21. That all defendants pay the costs of manufacturing and corrective nationwide advertising costs and relaunching of plaintiffs company brands and companies product line. To the original designation of origin..

22. A permanent injunction to all named defendants from contacting any of plaintiffs manufactures and suppliers or interfering with interstate or foreign commerce to any of plaintiffs company brands or companies brand product lines..

23. A EX PARTE SEIZURE .That HOMELAND SECURITY enforce the intellectual property rights of plaintiffs companies ;GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,HERE-DEAR INTERNATIONAL TM,FRANKIE SALLY INTERNATIONAL TM, CHUONG OO CHOOSE INTERNATIONAL TM;, that consists of product lines; STREETCLOTHES INCLUDING DENIM JEANS AND T-SHIRTS ,FOOTWEAR,FRAGRANCES,COSMETICS,FOOD PRODUCTS,MAGAZINES,SWIMWEAR INCLUDING BOARDSHORTS ,BEER,LIQUOR AND WINES,BEVERAGES,JEWELRY INCLUDING WATCHES,CERTAIN STATIONERY PRODUCTS ,CERTAIN TOY PRODUCTS,BIKES BRANDS , that could generate plaintiff billions to trillions of \$dollars in revenue. (SEE EXPERT WITNESSES AND DISPOSITION )

### **ON COUNT IV**

1. That this court liberally construe the RICO laws and thereby find that all defendants have conspired to receive income derived, directly or indirectly from a pattern of racketeering activity and/or directly or indirectly in the collection of an unlawful debt, participated, associated with enterprise and or used or invest, directly or indirectly any part of such income, in acquisition of any interests in, or the establishment or operation of any enterprise which is engaged in and, or of the activities that affect interstate or foreign commerce in violation of 18 U.S.C. 1961(5), 1962(a)(b)(c) (d)
2. That this court liberally construe the RICO laws and thereby find that all defendants have conspired to acquire and maintain an interest in, and or conspired to acquire and maintain control of a RICO enterprise engaged in a pattern of racketeering activity in violation of 18 U.S.C. 1961(5) 1962 (b) (d).
3. That all defendants and all their directors, officers, employees, agents, servants and all other persons in active concert or in participation with them, be enjoined temporarily during pendency of this action, and permanently thereafter, from conspiring to acquire, benefit, or maintain an interest in, or control of, any RICO enterprise that engages in a pattern of racketeering activity in violation of 18 U.S.C. 1961 (5), 1962 (d)
4. That all defendants and all their directors, officers, employees, agents, servants and all other persons in active concert or in participation with them, be enjoined temporarily during pendency of this action, and permanently thereafter, from conspiring to committing, or committing any more predicate acts in furtherance of the RICO enterprise alleged in COUNT ONE, COUNT II, COUNT III, COUNT IV
5. That all defendants be required to account for all gains, profits, and advantages derived from their several acts of racketeering in violation of 18 U.S.C. 1962 (d)
6. That judgement be entered for plaintiff and against all defendants for plaintiffs actual damages, and for any gains, profits, or advantages attributable to all violations of 18 U.S.C 1962 (d)
7. That all defendants pay to plaintiff triple damages, under authority of 18 U.S.C. 1964 (c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C. 1962 (d)
8. That all defendants pay to plaintiff cost of the lawsuit incurred herein including but not limited to, all necessary research, private investigations, expert witnesses, travel expenses, all non judicial enforcement and all reasonable pro se fee's at \$500 per hour @10 hours 6 days per week, 2015-2018, and other counsel fee's as listed in summary of damages.
9. A permanent injunction from all defendants from manufacturing, selling, or using any of plaintiffs named companies brand name or product lines in commerce.
10. That named defendants destroy any and all products manufactured and cloned, similar of plaintiffs companies brand identity.
11. That named defendants except defendants that have lived and resided in upstate new york prior to 2013 not ever relocate any business or resident property in upstate new york where plaintiff lives resides and does business, or their property forfeits to



.....**VERIFICATION**

I ,SHEILA ROBINSON ,Am a plaintiff in the above action . I have read the foregoing and know the contents therefore. The same is true of my own knowledge ,as to those said alledged on investigation ,evidence,information and belief as to those matters,Ibelieve to be true. I declare under penalty of perjury that the foregoing is true and correct and this declaration was executed in Albany New York 12202.

**DATED :** 12/26/2018

.....*Sheila Robinson*.....  
.....*Sheila Robinson*.....**X**

25 SECOND AVENUE  
ALBANY NEW, YORK 12206

plaintiff.

12. That named defendants except named defendants that resided prior to 2013 forfeit any property acquired in upstate new york. To plaintiff.

13. That named search engine defendants remove all named cybersquatted infringing domains from their computer servers.

14. That all domain registra defendants cancel all of the cyber squatted infringing domains of plaintiffs companies and companies product line identity.

15. That all search engine defendants remove the search pages created of plaintiffs companies identities,product line identities from their computer servers permantly.

16. That search engine defendants cease and de cease ,promoting,soliciting any marketing,sells,advertising,affiliation ,of any of plaintiffs companies ,or plaintiffs companies product lines permantly,and remove the hundreds to thousands to millions of other businesses from their computer servers in the online search for plaintiffs companies permantly.

17. That named defendants disclose any shell companies ,business interest ,investments,of similar,cloned names of plaintiffs companies brand names,or product lines and forfeit it to the plaintiff.

18. That all defendants be banned from buying any stock in plaintiffs public companies or possible public companies ,or investing in any of plaintiffs companies.

19. That all defendants pay the relocation costs of plaintiffs business/home.

20. That all defendants the cost of loss profits and revenue /un paid royalties /in junction relief/and other costs in detailed list in summary of damages

21. That all defendants registered trademarks cloned / as of /and /of plaintiffs companies and companies product lines be canceled.

22. That all defendants pay the cost of manufacturing and corrective nation wide advertising relaunching costs of plaintiffs companies brands and product lines to the original designation of origin.

23. A permanent injunction to all defendants from contacting any of plaintiffs manufacturers and suppliers or interfering with interstate or foreign commerce to any of plaintiffs companies or companies product lines.

24. A EX PARTE SEIZURE. That HOMELAND SECURITY enforce the intellectual property rights of plaintiffs companies;GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,HERE -DEAR INTERNATIONAL TM,FRANKIE SALLY INTERNATIONAL TM,CHUONG OO CHOOSE INTERNATIONAL TM,that consists of product lines;STREETCLOTHES INCLUDING DENIM JEANS AND T-SHIRTS,FOOTWEAR,FRAGRANCES,COSMETICS,FOOD PRODUCTS,MAGAZINES,SWIMWEAR INCLUDING BOARD SHORTS,BEER,LIQUOR AND WINES,JEWELRY INCLUDING WATCHES,CERTAIN STATIONERY PRODUCTS,CERTAIN TOY PRODUCTS,BIKES,that could generate plaintiff and plaintiffs companies \$billions to \$trillions of dollars. (SEE EXPERT WITNESSES AND DISPOSITIONS )

**CASE STATEMENT INTRODUCTION**

Plaintiff is a native New Yorker moving to New York in 1975, from Connecticut at 11 years old. Plaintiff worked at age 18 from 1982-1998, in Hauppauge New York, Deer Park New York, Farmlandale New York Melville New York manufacturing assorted products in many factories including toys, apparel, cosmetics, including Cosmetic Giants DELL LABS and ESTEE LAUDER. Plaintiff then in 1997 in Mastic New York started, named and formed as a sole proprietor brand name company business GORGEOUS JEANS INTERNATIONAL TM Plaintiff filed a DBA business certificate, and formed full brand name product line of street clothes, cosmetics, fragrances, magazines, footwear, swimwear food products SEE EXHIBITS E1, E2, and then forming online matching domain brand name in 1998 www.gorgeousjeans.com. Plaintiff formed the company in the dot com boom ERA, to generate millions of dollars in profit and advertised nationwide 24/7 the online website www.gorgeousjeans.com plans to go public, and full product line of street clothes, cosmetics, magazines, fragrances, footwear, swimwear, food products SEE EXHIBITS-E3 in which plaintiffs product line is essential to gain stockholders attention, with a continued nation wide 24/7 online website ad with the going public ? QUESTION MARK, and to make huge profits as other brand name companies, Plaintiff has maintained a online nation wide advertisement to go public since 1998-2018 and continuing in which the internet is the platform where start-ups make profit -some millions of dollars and then going public. Plaintiff is the first to start and form the gorgeous brand product line with the 1997 formation of GORGEOUS JEANS INTERNATIONAL TM which is the intellectual property rights of plaintiffs, who is entitled to exclusive rights and exclusive use. GORGEOUS JEANS INTERNATIONAL TM is plaintiffs brand trademark in which plaintiff has used the TM after the name in each and every use in online nationwide advertisements since 1998 and on products since 1997 informing the public of plaintiffs company brand name trademark and plans to go public. Plaintiffs brand name was formed with 3 generic words and as other brand names that were formed with generic wording as their brand and not in use by anyone such as PLAYBOY, HUSTLER, KENTUCKY FRIED CHICKEN, BURGER KING, Plaintiff advertised 24/7 nationwide online plans to go public in which millions have seen the only gorgeous product line with plans to go public and automatically obtaining common law trademark rights in 2003 after 5 years of forming and upon information and belief obtaining famous trademark rights as other brand companies in 2003-2018 SEE EXHIBITS-E4 with nation wide online ads at website www.gorgeousjeans.com 24/7 with plans to go public. Plaintiff also started and formed 2 other companies in 2013, INSIDE LIMOS CLOTHING TM SEE EXHIBITS-E5, AND HERE -DEAR SEE EXHIBITS E6, then a 3<sup>rd</sup> company in 2016 FRANKIE SALLY INTERNATIONAL TM SEE EXHIBITS E7 with full product lines, and forming and registering matching domain names of the High quality brand companies. Named defendants conspired and engaged in multiple unfair trade practices, that include false designation of origin, common law trademark infringement, multiple redicte

acts,economical espionage in the misappropriation of plaintiffs trade secrets,and one or more of the defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs company or companies in violation of extortion under the hobbs act and in violation of RICO. Plaintiff has been injured , named companies injured in loss revenue and profit as other brand companies, damages in corrective advertising,business goodwill and reputation damaged .Defendants did commit 2 or more predicate offenses in a manner in which they calculated and premeditated intentionally ,and intentionally to threaten continuity of wide spread racketeering activity which affect interstate and foreign commerce. ....

..... .. 1.upon information and belief and evidence # defendants 1,2,3,4,5,6,7,9,10,11,12,15,17 are the Ceo's and ex Ceo's of the enterprises yahoo, msn, google, bing, go duck go ,ask,aol,ask, SEE EXHIBITS -E8, are college educated computer programmers with o experience in manufacturing or brand product ownership prior to plaintiffs. SEE DISPOSITION DS1 Plaintiff formed company GORGEOUS JEANS INTERNATIONAL TM, and online company www.gorgeousjeans.com before defendants became search engines in which defendants bought out previous search engine providers SEE EXHIBIT E9. Defendants and named co-defendants in as early as 2004, and continuing, in which one of more conspired harm to plaintiff, targeted, cyberstalked , plaintiffs online website , seen the profits that plaintiff could profit as other brand name companies, plus even huger profits by taking business public as plaintiff had advertised nationwide 24/7 to do since forming GORGEOUS JEANS INTERNATIONAL TM .Plaintiff discovered in 2015 in as early as 2004 and continuing that defendants where an organized group that had formed together to take plaintiffs company ,acting in concert and using their business as a criminal enterprise, their computer, computer servers ,internet as a access device. www.gorgeousjeans.com SEE EXHIBITS E10 SEE DISPOSITION DS2. Defendants used emails to conceal the fact that they were actually intentionally interfering with traffic and commerce to plaintiffs website by emailing plaintiff as trusted helpful accredited search engine providers of dot com businesses to get traffic more by plaintiff injecting company domain into their blast engines. SEE EXHIBITS -E11----SEE DEPOSITION DS3- Defendants were actually soliciting ,selling ,and collecting profits from thousands to millions of other businesses knowingly and intentionally diverting online traffic and sales away from plaintiffs online website ,and then emailing plaintiff to continually inject their domain name in their search engine blasts to get more traffic to business as helpful accredited search engine providers,SEE ONLINE EVIDENCE, SEE DISCOVERY----D1---- to conceal that they were actually intentionally diverting online traffic of

hundreds to thousands to millions of plaintiffs online traffic away from plaintiffs online website towards other companies businesses including competitors of plaintiffs company SEE DIRECT ONLINE EVIDENCE SEE EXHIBITS E12.SEE DEPOSITION DS4 Defendants used their business as a criminal enterprise, and used their computer servers as a access device to than inject the thousands to millions of their solicited businesses that was collected as income and profit even removing plaintiffs name from the search of plaintiffs own online company,in unfair trade practices, using their computer servers. SEE EXHIBIT E13. Defendants used their computer servers as a access device to interfere with internet commerce, and collected income derived from a pattern of racketeering activity in computer fraud 18 usc 1029-1030, wire fraud 18 usc 1343,mail fraud 1341 ,scheme to defraud 1346,common trademark infringement under 43a 1125,unfair competition under 43a1125,economic espionage 18usc ,cyberstalking 2261a-b,racketeering 18usc1954,interference with interstate and foreign commerce 18 usc 1951,and extortion under the hobbs act in violation of rico 1962 (a)(b)(c)(d)

**A.** The same named defendants # 1,2,3,4,5,6,7,9,10,11,12,15,17, in as early as 2004 and continuing, continued schemes to defraud plaintiff and plaintiffs company and product lines ,and used their computer servers as a access device infiltrate and to sell,solicit and mis appropriate plaintiffs company and company product line trade secrets, embezzle the company brand identity of plaintiffs, and plaintiffs company brand product line identity. The defendants than created online search pages of plaintiffs product line GORGEOUS JEANS INTERNATIONAL TM in their computer servers, than injected multiply cyber sqatted domains of co defendants #

20,21,22,23,24,25,26,27,28,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,64,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,91,92,93,94,95, into their created online search pages of plaintiffs company identity ,and company brand product line identity to cause a mass false designation of origin and in unfair trade practices,and in furtherance of their schemes.. SEE EXHIBIT----E14-AND SEE ONLINE

EVIDENCE----- The acts of mass businesses with identical company identities of plaintiffs company appearing in the computer servers of the search engine defendants of plaintiffs product line,and online business where not isolated incidents of different businesses and individuals with the same company ideas at the same time but of the named organized group of computer programmer named defendants # 1,2,3,4,5,6,7,9,10,11,15,17 ceo' s of the search engine enterprises yahoo,google,msn,ask,bing,aol,go duck go, and .their co defendants and 3rd party associates that acted in concert, organized as a group and conspired a civil conspiracy to act in concert and use their business as a criminal enterprise and computer servers as a access device to divert online traffic to plaintiffs online company, infiltrate and embezzle plaintiffs company and plaintiffs company product line,and collect income derived from plaintiffs company any company product lines.. SEE EXHIBITS -E15--- SEE DISCOVERY D2 SEE DISPOSITION DS5 SEE ONLINE EVIDENCE

**B** Defefendants # 1,2,3,4,5,6,7,9,10,11,15,17 CEO'S and the unkown



agents, employee's of the search engine enterprises YAHOO, GOOGLE, FACEBOOK, ASK, MICROSOFT, GODUCKGO, ADSENSE, BING, AOL, DOGPILE defendants conspired with co defendants to create separate search pages to conceal their acts so that plaintiff would not discover the other identities in search for business online at [www.gorgeousjeans.com](http://www.gorgeousjeans.com) In the continued scheme to defraud, and embezzle the business identity of plaintiffs business GORGEOUS JEANS INTERNATIONAL TM. Defendants intentionally and knowingly injected multiply cyber squatted and cloned business identity and trademarks of plaintiff business and business product lines for sell online online in interstate and foreign commerce in furtherance of their scheme to embezzle plaintiffs company identity brand trademark, then to collect income derived from a continued pattern of racketeering activity. SEE ONLINE EVIDENCE EXHIBITS-----SEE DISCOVERY-----

C. Defendants intentional caused plaintiff damages in nation wide corective advertising costs at \$1million dollars a day at 365 days a year totaling \$1.095 billion dollars + lost in profits and revenue as other brand companies at \$20 million dollars a year at 3 years, amounting to \$60 million dollars - totaling \$ 2.550 billion dollars PLUS \$15 MILLION DOLLARS IN UN COLLECTED, UNAUTHORIZED LICENSING-ROYALTIES SEE EXHIBITS---- SEE EXPERT WITNESS-SEE SUMMARY OF DAMAGES -SEE RELIEF REQUESTED

2. upon information and belief and evidence, and plaintiffs discovery in 2015 defendant # 6 Marissa Mayer the ex ceo of search engine company yahoo SEE EXHIBITS E16--- in as early as 2004 – and continuing cyber stalked, stalked conspired, targeted, and participated in a pattern of multiply racketeering acts in schemes to defraud, and embezzle plaintiffs business brand identity, and trademark and product line brand identity. Defendant as ceo used the computer servers at yahoo as a access device to infiltrate, misappropriate plaintiffs company trade secrets, cause a false designation of origin and cause plaintiffs company loss in traffic and revenue and profits and intentional economic injury to business SEE EXHIBITS –E17 SEE DISCOVERY----- Defendant #6 as ceo of yahoo knowingly and intentionally interfered with commerce of plaintiffs interstate website ( 18 u.s.c.1951 ) injecting thousands to millions of other companies in unfair trade practices, and false designation of origin. Defendant #6 used yahoo's computer servers to intentionally divert internet traffic and revenue of the online searches of plaintiffs online website [www.gorgeousjeans.com](http://www.gorgeousjeans.com), and then collect income and payments from the activity and investing the income back into their business in a pattern of racketeering activity. SEE EXHIBITS, SEE ONLINE EVIDENCE

A. Upon information and belief and evidence in 2015 defendant # 6 left #32 employment at yahoo in 2015 and was chairman of co-defendant #30 CEO of walmart. SEE EXHIBIT E18----- ( while plaintiff was drafting rico complaint) Defendant #6 in as early as 2015 continued the scheme to defraud plaintiff and plaintiffs business cosmetic product line identity in which plaintiff sells cosmetics and fragrances with TM trademark on everything as GORGEOUS JEANS INTERNATIONAL TM-FLAMBOYANT COSMETICS- and sells cologne and

fragrances as GORGEOUS JEANS INTERNATIONAL TM -FLAMBOYANT FRAGRANCES .SEE PLAINTIFFS PRODUCT WEBSITE AT [www.insidelimosclothing.com](http://www.insidelimosclothing.com) and [www.gorgeousjeans.com](http://www.gorgeousjeans.com) that plaintiff has advertised online product lines for sale , since 1998 ,in which named defendants misappropriated plaintiffs company information as accredited search engine providers.The defendants # 6, 29 and # 32,36 are embezzling plaintiffs cosmetic identity and manufacturing the cosmetic product brand in unfair trade practices,and false designation of origin,obtained in economic espionage by the named search engine defendants selling and soliciting plaintiffs information. ... Defendants #6,29,32,36 started manufacturing and selling the gorgeous cosmetic line on line at walmarts,sephoria using the internet and mail delivery in furtherance of their schemes SEE ONLINE EVIDENCE ,SEE EXHIBIT -E19---SEE DISCOVERY -D3---SEE DISPOSITION DS6-- Defendants # 6,29,32,36 than used co defendants # 1,2,3,7,8,9,10,11,12,13,14,15,17,22, computer servers to place items in the co defendants separte created pages of plaintiffs company product brand online in commerce SEE EVIDENCE ONLINE , EXHIBIT E20 knowingly to collect and receive income from a pattern of racketeering activity and intentionally diverting revue and profits from plaintiffs online company with named co defendants and collecting for themselves.

**B** .Defendants intentionally caused plaintiff nation wide corective advertising costs at \$1 million dollars a day in corective advertising @ 365 days totaling \$1.095billion dollars ,+loss in profits and revenue as other name brands amounting to \$60 million totaling \$2.550 billion dollars .SEE EXHIBITS ,SEE EXPERT WITNESSES----- SEE RELIEF REEQUESTED

**C** .Plaintiff also alledges Upon information and belief if not for the fact that other name brand companies such as PLAYBOY, HUSTLER ,KENTUCKY FRIED CHICKEN ,started and formed before the defendants SEE EXHIBITS --E21----- the defendants would have preyed on their companies and used their computer servers to cause a mass false designation of origin and embezzle their company identity ,and company product line identity. ,companies that they have 0 to do with,0 to do with naming,forming,or obtaining common law trademarks.

**3.** upon information and belief and evidence and plaintiffs discovery in 2015 and continuing in as early as 2004 and the last 10 calendar years defendant # 29 David Mcconell of austraila seen plaintiffs online nation wide advertisement and stalked plaintiffs usa company from austraila. SEE EXHIBITS E22. Defendant in as early as 1998 stalked ,cyber stalked, , plaintiff and plaintiffs brand cosmetic product line identity knowingly and intentionally,knowingly seeing plaintiffs nation wide website with TM as plaintiffs company,and company product line that include cosmetics,fragrances trademark ,and knowingly cyber sqatting the domain name of plaintiffs company cosmetic brand identity ,and incorporating plaintiffs cosmectic product line identity ,then registering in 2004 [www.gorgeouscosmetics.com](http://www.gorgeouscosmetics.com) in violation of the 1999 Anticybersquatting act SEE EXHIBIT -E23,E24-----. with fraudulent intentions of defrauding and embezzling plaintiffs company brand identity,and cosmetic product line brand identity.. Defendant intentionally violated the 1999 cybersquatting act in which the domain is invalid. Defendant knew that plaintiff

was based in new york, and new jersey area and went out west to california SEE EXHIBIT E25—SEE DISPOSITION DS7--- to avoid and conceal plaintiff detection of defendants scheme to embezzle plaintiffs company identity and cosmetic brand identity...defendant also went to several u.s states, all except new york and conspired with co defendants walmart, sephora and ex ceo of yahoo defendant #6 to sell plaintiffs brand cosmetic identity in their stores, and online stores using the internet and mail delivery in furtherance of their schemes to defraud plaintiff and plaintiffs product line and collecting profits and revenue in unfair competition, false designation of origin 43a1125, interference with interstate and foreign commerce 18 usc, economic espionage, wire fraud, mail fraud, schemes to defraud 18 usc1346, cyberstalking, trademark infringement under 43a1125, extortion under the hobbs act, in violation of RICO 1962 (a)(b)(c)(d). SEE EXHIBITS—E26, E27, E28, E29- SEE ONLINE EVIDENCE--- One or more of the defendants and or co defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs company or companies and product lines. The named defendants conspired and manufactured and sold plaintiffs company brand cosmetic line in a scheme to collect income from a pattern of racketeering activities. The defendants conspired with search engine co defendants to cause a false designation of origin by using the search engines of co defendants who created a separate search page. In which Defendant claim to have started the brand gorgeous product line in australia, in which defendant did not SEE EXHIBITS E30 SEE DISCOVERY D6, SEE ONLINE EVIDENCE Defendant actually came to the usa to embezzle plaintiffs company brand identity and traveled back and forth to australia claiming ownership of plaintiffs company brand cosmetic line and trademark brand identity name. Interfering with interstate and foreign commerce SEE EXHIBITS E31 SEE ONLINE EVIDENCE. B.

Defendant intentionally caused plaintiff damages in nation wide corrective advertising costs at \$1 million dollars a day @ 365 days from plaintiffs 2015-2018 discovery and continuing totaling \$1.095 billion dollars+loss in profits as other brand name companies @ \$20 million dollars a year at 365 days at \$60 million dollars all totaling \$2.255 billion dollars -----SEE RELIEF REQUESTED

4. Upon information and belief, and evidence defendant in as early as 2002 and continuing and upon discovery in 2015 and in 10 calendar years defendant # 34 participated in schemes to defraud plaintiff and plaintiffs company brand identity and identity product line. Defendant Helen Gibson started a hair salon at unknown date, for which a investigation by plaintiff of start up dates online appear to be falsified, altered, and tampered with and not of the actual start dates, registration dates including the domain registration date appearing on go daddy as being 1997 in which go da daddy was not even a domain registra, for which network solutions was the only registra at the time, and posts by others calling the company a scam company. SEE EXHIBIT E32, E33, E34, E35, E36 SEE DISCOVERY D7 SEE DISPOSITION 8, AND 9 Dates on the wayback websites with hello gorgeous were also altered to appear that defendant sold cosmetic line which was obvious at glance to be altered SEE EXHIBIT E37 DISCOVERY D8. Defendant intentionally tried to conceal that



defendant never sold any gorgeous products before plaintiffs 1997 company or even possible registered the domain as recorded online with go daddy.com before plaintiffs registered 1998 domain [www.gorgeousjeans.com](http://www.gorgeousjeans.com) with networksolutions.com in which defendant conspired with search engine defendants in a scheme to defraud and embezzle the product line identity from the plaintiff

**A.** - upon knowledge, information, and evidence defendant Hellen Gibson of hair salon Enterprise Hello Gorgeous have 0 prior use ever of a gorgeous product line before plaintiff formed the 1997 company brand name and matching brand name full product line SEE DISCOVERY D9 SEE DISPOSITION DS10. Defendant Helen Gibson sold full or part ownership to possible co-defendants and associates possible law enforcement agents or ex law enforcement agents. SEE DISCOVERY D10 SEE DISPOSITION DS11 in which plaintiff has received stalking like incidents and bias treatment from law enforcement giving plaintiff probable cause they are the perpetrators of schemes to embezzle plaintiffs company GORGEOUS JEANS INTERNATIONAL TM identity. One or more of the defendants and or co-defendants conspired harm to plaintiff in furtherance of scheme to defraud plaintiff and plaintiffs company and or companies and product lines. The defendants enterprise Hello Gorgeous franchised salon claims to be non profit SEE EXHIBITS -E38--- SEE DISCOVERY D11 SEE ONLINE EVIDENCE Defendant Helen Gibson in 2012 cyberstalked plaintiffs company and website knowingly of plaintiffs plans to take company and conspired with search engine defendants to cause a false designation of origin of plaintiffs brand identity and product line identity, creating in 2012 domain name shophellogorgeous.com, intentional and knowingly inserting their online business in co defendants # 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,25,26 computer servers websites in search of plaintiffs online website SEE EXHIBIT E39-SEE ONLINE EVIDENCE--- and then manufacturing and selling in commerce infringing, cloned, as of products of plaintiffs company Trademark apparel, cosmetics, accessories brand product line identity intentionally in common law trademark infringement under 43a1125, unfair trade practices, and false designation of origin under 43a1125, racketeering under 18usc 1954, embezzlement 18usc, cyberstalking 2261a-b, and extortion under the Hobbs Act in violation of RICO 1962 (A)(B)(C)(d),. SEE EXHIBITS E40 SEE ONLINE EVIDENCE.

**B.** Plaintiff did not know of the hair salon existed until a news report about person being called Vinny Gorgeous owning a franchised Hello Gorgeous salon and went to jail in 2013 SEE EXHIBITS-E42-----

**C.** plaintiff also alleges that defendants Helen Gibson, in as early as 2015 and continuing cyberstalking plaintiffs company in which Plaintiff was also advertising 2015-2018 plans for a casino hotel coming soon upstate ny? SEE EXHIBITS E44 in which defendants then registered at the trademark office a similar mark to opening a similar venue SEE EXHIBIT ---E45----- in a continued scheme to cause a false designation of origin in which was done after seeing plaintiffs 2015-2018 website SEE DISPOSITION DS-12, in which their acts are about the plaintiff taking company public SEE DISPOSITION

DS13 in which is the motive defendants are trying to embezzle plaintiffs intellectual property rights and product line that is essential to taking public and stockholders investing . Defendants hello gorgeous salon has no bases for huge profits to take their company public. Investors would not invest in a hair salon in which does not create enough revenue, they have never advertised to take company public ,ever. Defendants are trying to cause a false designation , to embezzle plaintiffs product line in a scheme to defraud plaintiff and plaintiffs company in which plaintiff alleges they are trying to take over for themselves to go public using plaintiffs business identity and product line.

**D** Defendant intentionally caused plaintiff damages in nation wide advertising costs at \$1million dollars a day @365days a year since 2015- 2018 discovery and continuing amounting to \$1.095 billion dollars +loss in profits \$20 million dollars a year since 2015-2018 discovery and continuing \$60 million dollars totaling \$2.550 billion dollars in damages

**5.** Upon information and belief named defendants #

28,35,36,37,38,41,42,43,44,46,47,49,50,51,52,53,- are competitors of plaintiffs with their own brand name company,in which they cyberstalked plaintiffs online company and participated with co defendants #

1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17, 22 25,26 in as early as 2002 and continuing schemes to defraud plaintiffs company,interfere with commerce and revenue to plaintiffs company GORGEOUS JEANS INTERNATIONAL

TM,manufacturing cosmetic and fragrance using the 1997 unique trademark gorgeous of plaintiffs trademark on cosmetics and fragrances , on their products, and then collecting and receiving online payments from the as of products of plaintiffs ,in trademark infringement under 43a1125 ,false designation under 43a1125,unfair competition under 43a1125, cyberstalking - cyber bullying ,2261a-b,wire fraud 18usc 1343,mail fraud 1341,scheme to defraud 1346,racketeering 1954,extortion under the hobbs act 18usc ,interference with interstate and foreign commerce 18 usc ,in violation of RICO 1962 (a)(b)(c)(d) SEE ONLINE EVIDENCE , SEE EXHIBITS E46,47,48,49,50

**6.** Upon information ,belief and evidence and upon plaintiffs discovery in 2015-2018 in as early as 2004 and continuing named domain registra defendants # 76- #95 seen plaintiffs 1998 nationwide online advertisement to go public ,cyber stalked, and intentionally cybersquatted multiply domain names of plaintiffs company and or companies in violation of trademark laws 43a1125 a, the 1999 anti cyber squatting act knowingly and intentionally the names were of plaintiffs company identity,and product line brand name identities and trademarksSEE EXHIBIT E51 SEE DISPOSITION DS-14 SEE ONLINE EVIDENCE . Plaintiff used a TM in every nation-wide online ad 24/7,and on every product item. The defendants –used their business as a criminal enterprise and used their computer servers as a access device to infiltrate plaintiffs company and intentionally register the multiple similar domains of plaintiffs to themselves and co defendants,participating in and creating formed shell companies of plaintiffs companies brand identity ,and product brand identity SEE EXHIBIT E52 SEE DISPOSITION DS-15 in multiply schemes to defraud ,and embezzle plaintiffs company and plaintiffs product line . One or

more of the above named domain defendants or and co defendants conspired harm to plaintiff in furtherance of the schemes to defraud plaintiff. The above domain registra defendants participated in and conspired with search engine defendants to place the domain names of plaintiffs product line in co-defendants # 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,22,25,26 computer servers. to conceal from plaintiff from discovering the scheme. SEE EXHIBITS -E53,SEE ONLINE EVIDENCE ---- The defendants used their computer servers as a access device to infiltrate plaintiffs company brand identity,and collected payments in the scheme to defraud plaintiffs company causing false designation of origin under 43a1125of plaintiffs company and brand product line, unfair competition under 43a1125,trademark infringement under 43a1125, wire fraud 18usc 1343,mail fraud 18usc 1341,scheme to defraud 1346,interference with interstate and foreign commerce under 18 usc ,racketeering under 18usc, extortion under the hobbs act undr 18usc in violation of RICO 1962 (a)(b)(c)(d)

**A.** The defendants intentional caused damages in corrective advertising costs at \$ 1 million dollars a day at 365 days since discovery 2015 amounting to \$1.095 billion dollars + loss profits at \$20 million dollars a year since discovery 2015-2018 amounting to \$60 million dollars totaling \$2.550 illion dollars---SEE RELIEF REQUESTED

**B** Plaintiff did not discover the multiply schemes to embezzle company identity and company product line identity until 2015 after seeing www. shop hello gorgeous.com in the search page of plaintiffs website when plaintiff was checking for any sales of product line SEE EXHIBITS--E54-Plaintiff discovered that multiply named defendants had organized as early as 2002 to embezzle and defraud plaintiff and plaintiffs company in which plaintiff was receiving unusual police contact like stalking incidents.

**7.** While plaintiff was marketing and designing the GORGEOUS JEANS INTERNATIONAL TM -ice cream t-shirt product line in 2013 SEE EXHIBITS E55,plaintiff also formed a spin off company brand INSIDE LIMOS CLOTHING TM in 2013 SEE EXHIBITS E56-- a spin off of plaintiffs GORGEOUS JEANS INTERNATIONAL TM product line magazine title INSIDE LIMOS featuring the limousine industry ,that plaintiff kept the title and main feature a guarded trade secret until 2013 publication,in which plaintiff did not put any information on the computer,which is why the named defendants have not put ~~any~~ magazine featuring limousines as their own ,before 2013,in which they would have done just that.Plaintiff was homeless ,2006-2009, then 2011-2013 due t o stalking like incidentsregaring company GORGEOUS JEANS INTERNATIONAL TM. .. SEE EXHIBITS -56A--. Plaintiff formed and designed a full product line of street clothes, jewelry,footwear,beverages-that include beer and liquor,fragrances,cosmetics.,to make huge profits as other brands SEE EXHIBITS -E57-with plans to generate millions to billions and possible trillions of dollars in profit in which all of plaintiffs suppliers and associates thought the name brand was very marketable ,unique as a possible a top brand that could generate millions to billions of dollars in a year as other brands SEE EXHIBIT E58.Plaintiff also formed around the same time another brand name company

HERE -DEAR in 2013 SEE EXHIBITS E59 designing a full product line of street clothes,beverages and liquor,food products SEE EXHIBITS E60-----. Plaintiff allleges that the name brand company was not in use or infridging on any ones brand or product line or in the search engine defendants computer server searches. SEE EXHIBITS E61 ,SEE DISCOVERY D14,SEE DISPOSITIONS D-S17-,and there was o products in the online search of any similar company brand name or product brand line name, in which plaintiff was trying to get online sales,not knowing that named defendants where cyber stalking plaintiff and plaintiffs company.. SEE DISCOVERY D 15 SEE DISPOSITION DS18

**A.** In a new cause of action ,upon information and belief and evidence ,and plaintiff discovery in 2015,in as early as 2013 that search engine defendants had continued cyber stalking plaintiff and cyber stalked plaintiffs 2n<sup>d</sup> brand company identity and company brand product line INSIDE LIMOS CLOTHING TM in a continued pattern,and scheme to defraud plaintiffs brands identity. Defendants used their business as a criminal enterprise and computer servers as a access device to again interfere with commerce to plaintiffs online website. Named defendants in similar pattern as plaintiffs other company GORGEOUS JEANS INTERNATIONAL TM had removed plaintiffs 2016 online website www.insidelimosclothing.com from the search of online company ,and in a continued pattern solicited and injected thousands to millions of other companies in the search of plaintiffs online website .SEE EXHIBIT E62 – SEE DISCOVERY D16 SEE DISPOSTION DS19--- to divert traffic away from plaintiffs online company and collect and receive income derived from a pattern of racketeering. Plaintiff also alledges upon information and evidence that defendants would place plaintiffs website back in their computer servers when they think plaintiff was watching,and then remove from their computer servers when they thought plaintiff was not such as major inter ruptions in plaintiffs life,such as becoming homeless because of related stalking incidence to residence and having plaintiff evicted. Plaintiff also alledges one or more of defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs company or companies

**B.** Defendants # 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17, in the continued pattern to defraud plaintiff, solicited, and sold,and misappropriated plaintiffs trade secrets to named co defendants and others.Defendants used their business as a criminal enterprise and computer servers as a access device to again create separate search pages of plaintiffs product line identity INSIDE LIMOS CLOTHING TM ,and product line of t-shirt apparel,streetclothes,watches,liquor,beverages,footwear,cosmetics,fragrances,s wimwear, diverting traffic and revenue and profits to plaintiffs online company in a continuing pattern to embezzle,defraud plaintiffs companies and product lines.The defendants The defendants than inject the co defendants cybersquatted domains and embezzled cloned,similar,as of products and identities of plaintiffs company INSIDE LIMOS CLOTHING TM product line in their created separte search pages of plaintiffs product lines using the internet and mail receiving to collect income derived from a pattern of racketeering activity in unfair trade practices under 43a1125,false designation under



43a1125,trademark infringement under 43a1125,computer fraud under 18usc 1029,1030, wire fraud 1343,mail fraud 1341,scheme to defraud 1346,cyberstalking2261a-b,interference with commerce 18 usc embezzlement 18usc , racketeering 18usc extortion under the hobbs act 18 usc , in violation of RICO 1962 (a)(b)(c)(d) SEE EXHIBIT E64 ,SEE DISCOVERY D18 ,SEE DISPOSITION DS20, SEE ONLINE EVIDENCE

**8.** In a new cause of action defendants #

1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17 continued in cyber stalking of plaintiffs companies and trade secrets ,defendants stole , solicited, misappropriated,sold and used plaintiffs brand name and apparel trade secrets to product lines. One or more of the defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs companiesand product lines..SEE EXHIBITS E65,SEE DISCOVERY D19, SEE DISPOSITIONS DS21 SEE

ONLINE EVIDENCE-----Defendants then organized , and ,conspired with co defendants # 50, #51 CEO of disney and pixar to participate ,and intentionally name a computer movie INSIDE -OUT as of /similar to plaintiffs company brand identity in a scheme to defraud plaintiffs company brand and brand product lines. SEE EXHIBIT 66.The defendants are all associates and investors of each other. SEE EXHIBIT E67 ,SEE DISCOVERY D22 SEE DISPOSITON DS22. Defendants # 50,51 started manufacturing and selling a apparel line of sublimation clothing similar as plaintiffs sublimation apparel on co

defendants # 3,8,13,14, computer servers and website . SEE EXHIBITS E68,SEE DISPOSITION DS22 -Defendants used the movie theaters, internet and mail receiving services to collect income and revenue derived from the a pattern of racketeering activity, in false designation of origin under 43a1125,trademarkinfridgement under 43a1125 ,cyberstalking 2261a-b, unfair trade practices under 43a1125,economical espionage under ,wire fraud 18usc1343,mail fraud 18usc1341,scheme to defraud 18usc 1346,racketeering under 18usc ,extortion under the hobbs act 18usc, in violation of RICO 1962 (a) (b)(c)(d). SEE EXHIBITSE-69- SEE ONLINE EVIDENCE

**A.** The defendants 2015 movie INSIDE OUT title has no bases as a title and was obtained by defendants in economic espionage, in a pattern of racketeering activity to embezzle ,.clone disrupt and sell the brands of plaintiffs company INSIDE LIMOS CLOTHING TM.SEE EXHIBITS E70. Defendants and co defendants cyber stalked plaintiff,and plaintiffs company and stole plaintiffs trade secrets and used them to clone plaintiffs INSIDE LIMOS brand. Plaintiff designed the formation of INSIDE LIMOS CLOTHING TM as a flashy name brand apparel in which disney or pixar have never formed any flashy clothing brand ever. SEE EXHIBITS.E71----- .SEE DISCOVERY D23 Defendants used their business as a criminal enterprise ,and computers as a access device to clone the company brand identity from plaintiffs brand and used their computers to create a title movie based on plaintiffs 2013 company brand identity. Defendants collected in income derived from a pattern of racketeering.

**B.** Defendants intentionally caused plaintiff damages in nation wide corrective advertising costs at \$ 1 million dollars a day at 35 days since 2015-2018 discovery and continuing amounting to \$1.095 billion dollars + loss in profits as

other brand companies since discovery 2015-2018 at \$20 million dollars a year at 365 days amounting to \$60 million dollars totaling \$2.550 billion dollars SEE EXHIBITS .SEE EXPERT WITNESS.SEE RELIEF REQUESTED

**9.** Upon information,belief and evidence defendants # 30 Kim Kardashian west and # 31 Kyle Kardashian knowingly tried to cause a false designation of plaintiffs cosmetic brand,by knowingly publicly marketing the infringing,cloned,similar,as of cosmetic line of Australian defendant who later placed online. Defendant #29 had cybersquatted plaintiffs product line,and tried to embezzle,cause a false designation of origin of Plaintiffs Brand and Brand cosmetic line GORGEOUS JEANS INTERNATIONAL TM-FLAMBOYANT COSMETICS-FLAMBOYANT FRAGRANCES-,and in which one or more co-defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs 1997 company GORGEOUS JEANS INTERNATIONAL TM.The defendants #30.#31 then , later launched their own cosmetic line.Plaintiff had advertised to take full brand product line GORGEOUS JEANS INTERNATIONAL TM public since 1998.Defendants motive was to harm competition in unfair trade practices 43a1125,false designation 43a1125, wire fraud 1343,scheme to defraud 1346,extortion under the hobbs act in violation of RICO 1962 (c)(d)

**10.** Upon information defendant #33 KANYE WEST conspired with co-defendants # 57,58,59 and and unknown , who cyberstalked plaintiffs company and created a infringing,cloned,similar,as of brand name of plaintiffs brand and apparel brand tshirt line and accessories formed by plaintiff .Defendants placed defendants signature jesus brand on multiply t-shirts implying that defendant is the owner,investor,associate of the cloned ,infringing brand of plaintiffs brand.Defendants then placed for sale products on co defendants # websites,and computer servers.One or more of the co- defendants conspired harm to plaintiff in violation of the hobbs act, in unfair competition 43a1125,false designation of origin , misappropriation of trade secrets ,cyberstalking-cyber-bullying 2261a-b, scheme to defraud 18usc1346,wire fraud 18usc1343,mail fraud 18usc1341,trade mark infringement,racketeering 18usc in violation of RICO 1962 (a)(b)(c)(d)

**11.** Upon information and belief and evidence defendants # 8,13,14,22,25,26,28,32,43,44,45,46,47,48,58,59,60,61 used their websites to sell,manufacturer products of plaintiffs brand companies identity. Defendants placed manufactured products as of ,infringed,similar,incorporating plaintiffs company brand identity in co- defendants created separate pages on their computer servers,and search engine defendants to collect income derived from a pattern of cyberstalking,cyberbullying, racketeering activity in unfair trade practices 43a1125 ,false designation of origin 43a1125 ,trademark infringement 43a1125,2261a-b,wire fraud 18 usc 1343,mail fraud 1341,scheme to defraud 1346,trafficking in counterfeit goods ,economic espionage,racketeering 18usc,extortion under the hobbs act in violation of RICO 1962(a)(b)(c)(d).SEE EXHIBITS -E72----- SEE DISCOVERY-D24---DISPOSITION DS24----

**12.** Upon information ,belief and evidence ,defendant # 55,56 JEFF PIGOZZI and KD WAVE CEO cyberstalked plaintiff and plaintiffs online company INSIDE

LIMOS CLOTHING TM in as early as 2013 and continuing and schemed to defraud plaintiffs brand forming a similar name brand apparel line, and falsifying start up dates, and name, to intimidate plaintiff and plaintiffs company, and then posted for sell limoland apparel on co defendants #3 computer servers website enterprise facebook in 2016. The named defendants are associates of the named co-defendants and one or more of the defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs companies and companies product lines. in unfair trade practices 43a1125, false designation of origin 43a1125, trademark infringement 43a1125, trafficking in counterfeit goods 18usc, wire fraud 18 usc 1343, mail fraud 1341, scheme to defraud 18 usc 1346, racketeering 18usc, extortion under the hobbs act, in violation of RICO 1962 (a)(b)(c)(d) SEE EXHIBITS, SEE DISCOVER, SEE DISPOSITION SEE ONLINE EVIDENCE

**13.** Upon information and belief, evidence defendants # 57 LIMOS AND LIQUOR LLC cyberstalked plaintiff and plaintiffs company and t-shirt apparel line. Defendants schemed to defraud plaintiff and plaintiffs 2013 company INSIDE LIMOS CLOTHING TM manufacturing as of/similar/cloned/incorporating plaintiffs t-shirt apparel line, and selling in commerce and online on co defendants websites and leaving no contact info as to who the real person is. Defendants appear to be in contact with co defendant #3, 44, 48, 59. the defendants are cloning, infringing, incorporating plaintiffs brand in unfair trade practices 43a1125, trade mark infringement 43a1125, false designation of origin 43a1125, scheme to defraud 18usc 1346, wire fraud 18usc 1343, mail fraud 18usc 1341, trafficking in counterfeit goods 18usc, extortion under the hobbs act, racketeering in violation of RICO 1962 (a)(b)(c)(d)

**14.** Upon information and belief defendants # 52, 53, 54 CEO of VOSTEC WATCHES AND LG ENTERPRISES. Defendants schemed to defraud plaintiffs watch accessories brand, creating and manufacturing infringing/as of/cloned/incorporating plaintiffs company brand and watch product brand line. The named defendants intentionally misappropriated plaintiffs watch brand and obtained the information of plaintiffs company from one or more of co defendants in economical espionage. It is no coincidence that the defendants and plaintiff came up with the same similar logo watch name brand identity at the same time. Defendants are manufacturing and selling watches of plaintiffs watch brand in unfair trade practices 43a1125, false designation of origin 43a1125, trademark infringement 43a 1125, trafficking in counterfeit goods 18usc, economic espionage 18usc, racketeering 18usc, extortion under the hobbs act in violation of RICO 1962(a)(b)(c)(d)

A. Defendants intentionally caused plaintiff damages in nation wide corrective advertising costs at \$1 million dollars a day @ 365 days since discovery 2015-2018 amounting to \$1.095 billion dollars+ a loss in profits as other companies at \$20 million dollars a year amounting to \$80 million dollars a year totaling \$1.175 billion dollars. --SEE RELIEF REQUESTED

**15-16.** In a new cause of action Upon information and belief and evidence defendants # 8, 13, 14, amazon, and ebay and 3rd party associates -- cyber stalked and conspired to embezzle plaintiffs company brand identity in a

continued scheme to defraud and embezzle plaintiffs company INSIDE LIMOS CLOTHING TM. The defendants are associates and investors of the co-defendants and one or more conspired harm to plaintiff. Defendants #8,13,14 used their business as a criminal enterprise and their computer servers as a access device to placed for sell the brand identity of plaintiffs t-shirt product line brand identity, and watches line brand identity on their computer servers using the internet and mail receiving services in a pattern and in furtherance of their scheme to to embezzle, defraud, cause a false designation of origin of plaintiffs company brand identity and cause a loss in revenue and profits to plaintiffs apparel line SEE EXHIBITS E73,74,SEE DISCOVERY D25,SEE DISPOSITION DS25 Defendants posted \$20 t-shirts of plaintiffs t-shirt apparel line identity, reducing the price of plaintiffs apparel t-shirt line. Plaintiffs t-shirt apparel line is a luxury brand line that plaintiff priced sells at \$75 per t-shirts. SEE EXHIBITS E75,76,SEE DISCOVERY D26. Defendants have never sold, market, any limo, or limousine t-shirts until plaintiff formed company in 2013. SEE EXHIBITS E 77,78 SEE DISCOVERY D27 SEE ONLINE EVIDENCE ----- defendants used their business as a criminal enterprise and computer servers as a access device to sell counterfeit apparel of plaintiffs brand and collect income derived from the pattern of cyberstalking, misappropriation of plaintiffs trade secrets and trade dress racketeering from plaintiff and plaintiffs company, in unfair trade practices 43a1125, false designation of origin 43a1125, trademark infringement 43a1125, computer fraud 18 usc 1030-1029, wire fraud 18usc 1343, mail fraud 18usc 1341, interference with interstate and foreign commerce 18usc, economic espionage 18usc, extortion under the hobbs act, racketeering 18usc, embezzlement 18usc in violation of RICO 1962 (a)(b)(c)(d)

A. Defendants intentionally caused plaintiff damages in nation wide advertising costs at \$1 Million dollars a day since discovery 2015-2018 at 365 days amounting to \$1.095 billion dollars+ loss in profits as other companies at \$20 million dollars a year amounting \$60 million dollars totaling \$2.500 billion dollars. PLUS UNCOLLECTED ROYALTIES OF \$ 15 MILLION DOLLARS

17. In a new cause of action upon information and belief and evidence named defendants # 65,66,67 worked in the commerce dept and under color of law participated in racketeering schemes to defraud and embezzle plaintiffs companies, and product lines. Defendants knowingly registered multiply trademarks of plaintiffs companies and plaintiffs product line GORGEOUS JEANS INTERNATIONAL TM, INSIDE LIMOS CLOTHING TM, HERE-DEAR INTERNATIONAL TM, FRANKIE SALLY to co defendants. SEE EXHIBITS - E79,E80 SEE DISCOVERY D28, SEE DISPOSITION DS26 SEE ONLINE EVIDENCE

A. Defendants while employed at the U.S. Department of commerce targeted plaintiffs companies, solicited out plaintiffs trademarks, that plaintiff named, formed, and started, that could generate plaintiff millions to billions of dollars in revenue. Defendants handed plaintiffs trademarks out as if they where, to foreign residents, and codefendants as their own personal usage, without plaintiffs knowledge, and conduct of bribery in exchange.. Plaintiff has kept nationwide ads online and a internet check would have revealed that



plaintiff formed the companies, and trade marks belonged to plaintiff. Defendants used their computers, internet, and emails as a access device, to collect and receive income derived from the pattern of racketeering activity, in unfair trade practices 43a1125, in unfair competition 43a1125, false designation of origin 43a1125, economic espionage, fraud 18usc1064, cyberstalking 2261a-b, wire fraud 18 usc 1343, mail fraud 18usc 1341, computer fraud 18 usc 1029-1039, extortion under the hobbs act 18usc in violation of RICO 1962 (a)(b)(c)(d)

**B.** Defendants intentionally caused plaintiff damages in corrective advertising costs at \$1 million dollars a day at 365 days since discovery in 2018 amounting to \$365 million dollars + loss in profits as other brand companies at \$20 million dollars a year totaling \$385 million dollars

**18.** Upon information and belief, and evidence named defendant #3 Mark Zuckerberg Ceo of facebook targeted stalked, cyber stalked plaintiff and plaintiffs company GORGEOUS JEANS INTERNATIONAL TM, in as early as 2010 SEE EXHIBIT E81, SEE DISPOSITION DS27 in a scheme to embezzle and defraud plaintiffs company brand identity. Defendant #3 did use the business as a criminal enterprise and computer servers as a access device to solicit, misappropriate the tradesecrets of plaintiffs company. Defendant inject multiply companies of co defendants cybersquatted domains, infidging, cloned, similar, as of companies of plaintiffs into facebook computer servers in a scheme to cause a false designation of plaintiffs company brand identity and product line. Defendants manufactured and used the internet and mail receing to sell products of as of similar, cloned of plaintiffs in defendants business and computer servers and to clect income derived in a pattern of racketeering activity to defraud plaintiffs company GORGEOUS JEANS INTERNATIONAL TM in unfair trade practices 43a1125, trademark infringement 43a1125, false designation of origin 43a1125, cyberstalking 2261a-b, computer fraud 1030-1029, wire fraud 18usc 1343, mail fraud 1341, scheme to defraud 1346, economic espionage 18usc, in violation of RICO 1962 (a)(b)(c)(d). SEE EXHIBITS E82, SEE DISCOVERY D29, SEE DISPOSTION DS28, SEE ONLINE EVIDENCE

**A.** Defendant intentinally caused plaintiff damages in nation wide corrective adverting costs at \$1 million dollars per day at 365days a year since discovery 2015 totaling \$1.095 billion dollars + loss in profits as other company brands at \$20 millillion dollars a year totaling \$2.550 billion dollars, PLUS UNPAID ROYALATIES AT \$15 MILLION DOLLARS

**B.** In a second cause of action against defendants FACEBOOK continued to target, cyber stalk plaintiffs companies and product lines with co-defendants. Defendant FACEBOOK and co defendants used their business as a criminal enterprise and computer servers as a access device to infiltrate and embezzle the company brand identity of plaintiffs 2ndcompany INSIDE LIMOS CLOTHING TM SEE EXHIBIT E84, SEE DISCOVERY D31, SEE DISPOSITION DS29 SEE ONLINE EVIDENCE ---. Defendant # 3 used the computer servers of business FACEBOOK to inject multiply companies of co defendants knowingly of plaintiffs company brand identity INSIDE LIMOS CLOTHING TM and product line identity to intentionally cause a false designation of origin in a pattern of similar

racketeering activity to divert traffic and revenue from plaintiff and plaintiffs companies. Defendant # 3 is a associate and investor of co- defendants in which one or more of the co-defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs companies. Defendants co-defendants manufactured and sold product lines of plaintiffs brand identity on FACEBOOK using the internet, and email services to collect and receive income derived from a pattern of racketeering activity, in the misappropriation of plaintiffs trade secrets, trade mark infringement 43a1125, false designation of origin 43a1125, unfair competition 43a1125, racketeering 18usc, economic espionage 18usc, extortion under the hobbs act in violation of RICO 1962 (a)(b)(c)(d)

1. Defendants intentionally caused plaintiff damages in nation wide advertising costs at \$1 million dollars a day at 35 days totaling \$1.095 billion dollars + loss in profits as other brand companies at \$20 million dollars a year totaling \$2.055 billion dollars

C. In a third cause of action against defendants FACEBOOK, defendant # 3 in a similar continued pattern used their business as a criminal enterprise and computer servers as a access device to cause a false designation of origin of plaintiffs 3rd company brand company HEARE -DEAR INTERNATIONAL TM. SEE EXHIBITS 85, SEE DISCOVERY-D32, SEE DISPOSITION DS30 SEE ONLINE EVIDENCE---Defendant # 3 used business as a criminal enterprise and computer servers to inject multiply companies as of, similar, infringing, cloned of plaintiffs company brand identity. HERE -DEAR INTERNATIONAL TM. Co defendants manufactured and sold products as of, infringing, cloned, of plaintiffs product line identity on FACEBOOK using the internet and email service to collect and receive income derived from a pattern of racketeering activity in unfair competition, 43a1125, trademark infringement 43a1125, false designation of origin 43a1125, scheme to defraud 18usc1346, wire fraud 18usc1343, mail fraud 1341, computer fraud 18 usc 1030-1029, economic espionage 18usc, racketeering 18usc, cyberstalking-cyberbullying 2261a-b, interference with interstate and foreign commerce, extortion under the hobbs act in violation of RICO 1962 (a)(b)(c)(d)

1. Defendants intentionally caused plaintiff damages in nation wide corrective advertising costs at \$1 million dollars a day at 365 days totaling \$1.095 billion dollars + loss in profits as other brand companies at \$20 million dollars a year at \$60 million dollars totaling \$2.550 billion dollars

D. In a continued cause of action defendant # 3 continued to plaintiffs 4th company FRANKIE SALLY INTERNATIONAL TM using their business as a criminal enterprise and computer servers as a access device to inject multiply similar, cloned, as of names of plaintiffs business identity and business product line identity. SEE EXHIBITS E86, SEE DISCOVERY D33, SEE DISPOSITION DS -31 Defendant #3 and co defendants knowingly and intentionally manufactured products of plaintiffs brand identity in a scheme to cause a false designation of origin of plaintiffs company brand identity, and product line identity. Defendant used the internet and mail receiving services to collect income derived from a pattern of racketeering activity and misappropriate trade secrets of plaintiffs company and companies product lines in unfair

competition 43a1125, trademark infringement 43a1125, false designation of origin 43a1125, computer fraud 18 usc 1029-1030, wire fraud 18 usc 1342, mail fraud 1341, cyberstalking-cyberbullying 2261a-b, economic espionage 18 usc, racketeering 18 usc 1954, extortion under the hobbs act in violation of RICO 1962 (a)(b)(c)(d)

1. Defendant intentionally caused plaintiff damages in nation wide corrective advertising costs at \$1million dollars a day at 365 days since discovery amounting to \$1.095 billion dollars +loss in profits as other brand companies @ \$20 million dollars a year since 2015-2018 amounting \$60 million dollars totaling \$2.500 billion dollars

19.. Upon information and belief and evidence named defendants # 79 networksolutions domain registras cyber stalked, and conspired to defraud and cause a false designation of plaintiff,s companies ,GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,FRANKIES SALLY INTERNATIONAL TM,. Defendants used their business as a criminal enterprise and computer servers as access device to intentionally register multiply domain names of plaintiffs company identity and company brand identity product line identity to themselves and co defendants knowingly that they where the trademarks and business identity of plaintiffs . SEE EXHIBITS E87 SEE DISCOVERY D34,SEE DISPOSITION DS32. Defendant # 79 and co-defendant chase bank in 2017 used their computer,internet, and computer servers as a access device to block plaintiff from paying fees on domain names of plaintiffs business product brand name INSIDE LIMOS and plaintiffs aka name FRANKIE SALLY that plaintiff formed and registered in 2016 [www.insidelimosclothing.com](http://www.insidelimosclothing.com) and [www.frankiesally.com](http://www.frankiesally.com) .defendants intentionally blocked payment and then registered the names to themselves and then sold them to co defendants in a continued scam to defraud plaintiff and plaintiffs business identity and business identity product line. SEE EXHIBITS E88,89-SEE DISCOVERYD35--Defendants used the internet and emails to collect income derived from a pattern of racketeering activity in unfair competition 43a1125,computer fraud 18 usc 1029,wire fraud 18 usc 1343,mail fraud 18 usc 1341, cyberstalking-cyberbullying 2261a-b,economic espionage 18usc , extortion under the hobbs act in violation of RICO 1962 (a)(b)(c)(d)

1.A Defendants intentionally caused plaintiff nation wide corrective advertising damages at \$1million dollars a day at 365 days amounting to since 2015-2018 \$1.095 billion dollars+loss in income and profits as other brand companies \$20 million dollars a year ,amounting to \$60million dollars totaling \$2.550 billion dollars

20.Upon information and belief and evidence defendants # 49 yellow book cyber stalked -cyberbullied plaintiff and plaintiffs company GORGEOUS JEANS INTERNATIONAL TM and participated and conspired with co defendants who are associates and investors , to use their business as a criminal enterprise to intentionally post slandering and defamation posts of plaintiff and plaintiffs company GORGEOUS JEANS INTERNATIONAL TM on co defendants computer servers of named defendants # 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17, of plaintiff being muslim and sold

muslim products in the online searches of plaintiffs online company knowingly to be false SEE EXHIBIT E90--SEE DISCOVERY D36,SEE DISPOSITION DS33-----. Defendants used the internet to intimidate consumers into not going on plaintiffs online website in a continued scheme to interfere with commerce affecting interstate and foreign commerce in unfair competition 43a1125,cyberstalking-cyber bullying 2261a-b,wire fraud 18usc 1343,hate crime 18usc ,extortion under the hobbs act 18usc ,in violation of RICO (c)(d)  
 A. Defendants intentionally caused plaintiff damages in nation wide corrective advertising costs at \$1 million dollars a day at 35 days totaling \$1.095 billion dollars +loss in profits as other brand name companies.

**21.** upon information and belief and evidence named defendants # 18,19,20,21,23,24,27,29,39,40,55,56,57,64,stalked,cyberstalked,cybersquatted on plaintiffs company brand identity and company brand product line identity. One or more of the defendant ,co- defendants conspired harm to plaintiff in a scheme to defraud plaintiff and plaintiffs compmpanies. Defendants registered the domain names as of ,cloned,similar,infridging, incorporating plaintiffs company and or companies trade mark brand identity in violation of the anticybersquatting act. The defendants formed shell companies with investor funds and manufactured products of one or more of plaintiffs company brand identities and business identity product line identities GORGEOUS JEANS INTERNATIONAL TM,INSIDE LIMOS CLOTHING TM,HERE-DEAR INTERNATIONAL TM,FRANKIE SALLY INTERNATIONAL TM, posted them on co defendants computer servers that separated plaintiffs company to conceal plaintiffs discovery,in trademark infridgement 43a1125,unfair competition 43a1125,false designation of origin 43a1125, scheme to defraud 18 usc 1346, wire fraud 1443,mail fraud 1341,computer fraud 18 usc 1029-1030,misappropriation of trade secrets,racketeering 18usc ,extortion under the hobbs act in violation of RICO 1962 (a)(b)(c)(d) . SEE EXHIBIT E 91,SEE DISCOVERY D 37,SEE DISPOSITION DS34

1.Defendants intentionally caused plaintiffs company mass corrective advertising damages at \$1 million dollars a day at 365 since discovery 2015-2018 amounting to \$1.095 billion dollars + loss in profits as other brand companies at \$20 million dollars a year am dollars all totaling \$ 2.550 billion dollars

**22.** upon information and belief and evidence person defendant #68 michael bloomberge appears to be the perpatrator behind a pattern of unusal stalking like incidents to residents in as early as 2005 and continuing in some unusal hate crime act.Plaintiff had apts in nj in which persons of the jewish religion bought buildings,payinyng twice what they where worth ,and then having plaintiff evicted. SEE EXHIBITS E92,SEE DISCOVERY D38,SEE DISP OSITION DS35 The unusal stalking like incidents seem to be hate crimes related targeting plaintiff and related to plaintiffs company GORGEOUS JEANS INTERNATIONAL TM in which plaintiff had been promoting and advertising to go public since 1998.. The named defendant is associated with th co -defendants. SEE EXHIBITS E93,SEE DISCOVERYD39,SEE DISPOSITION DS36 -. The defendant has contacted both mayors of the towns that plaintiff relocated to,



after harassment like incidents by local officials and law enforcement officials, in which plaintiff complained to the local FBI SEE EXHIBIT E94, SEE DISCOVERY-D40. plaintiff was harassed by local officials and local police soon after defendant made contact. A pattern of incidents that included using local police officers, mayors, drug dealers as hitmen to cause trouble and harm for plaintiff at residence is conduct related to defendant, and the schemes to embezzle plaintiff's companies. The latest incidents is of the local police station two blocks away from plaintiff's residence, and police officers' conduct is of accepting bribery, not respond to drug dealers loitering for long periods around residence of plaintiff as if told not to by three local ex police chiefs in Albany N.Y. Plaintiff also alleges of needing assistance and got 0 response, multiple times, conduct of bribery, and running a protection racket for the drug dealers... Plaintiff had made multiple inquiries regarding defendant # 68 to the FBI about probable cause to charge plaintiff with stalking plaintiff as a hate crime with 0 response. SEE EXHIBITS-E95 SEE DISCOVERY D41, SEE DISPOSITION DS37-- Plaintiff has had to relocate in response to incidents. Plaintiff has probable cause to believe defendant is the perpetrator of incidents and other incident of conduct of bribing a judge. In which person Judge Lawrence Bushing was sworn in by Bloomberg and then immediately interrupted and presided over a criminal misdemeanor case of plaintiff's, and violated plaintiff with fraud upon the courts. Judge made false statements claiming plaintiff was suffering a mental disease that was interfering with plaintiff from understanding the proceedings, in which was absolutely false. The judge then tried to have plaintiff committed to a mental facility, issued a warrant out for plaintiff's arrest twice for not appearing, in which plaintiff never missed a court date. The complainant never appeared in court and plaintiff was entitled to a dismissal for failure to prosecute at trial date in which plaintiff attended court for two years on the misdemeanor charge. Plaintiff alleges person defendant is the cause of the fraud upon the court incident in which plaintiff found out later the connection between defendant and Judge Bushing, also other unusual incidents. SEE EXHIBITS-E96,

Defendant appears to have stalked plaintiff to plaintiff's upstate residence, contacted defendant # 69 the mayor of Albany, and others in Albany, and upstate locations and orchestrated acts to cause trouble for plaintiff. Defendant is associated with co-defendants and one or more of the defendants conspired harm to plaintiff, to get plaintiff murdered by drug dealers in a scheme to defraud plaintiff and plaintiff's companies in violation of murder for hire 18usc, bribery 18usc, extortion under the Hobbs Act, hate crimes act 18usc, stalking 2261a-b, retaliation 18usc, in violation of RICO 1962 (c) (d) -- **23.**

upon information and belief and evidence, defendants # 70, 71, 72, 73 Albany New York ex police chiefs from 2015-until 2018. The ex police chiefs and local officers participated in violent racketeering schemes related to embezzling plaintiff's companies. The local Albany New York ex police chiefs conspired with co-defendants to get plaintiff out of apt. SEE DISCOVERY D48, SEE DISPOSITION DS 45, out of New York so that co-defendants could set up

companies of plaintiffs companies identity in NEW YORK. Defendants # 70,71,72,73 conspired as rogue gangsters under the color of law and above the law to interfere and block plaintiffs equal right to police protection, by luring dangerous armed drug dealers carrying guns to sell narcotics around plaintiffs apt. an. Defendants allowed the drug dealers to loiter and sell narcotics on a daily base 2015-2018. SEE EXHIBITS E109 SEE DISPOSITION DS46. When plaintiff would call the police on the drug dealers to get away from residence, the Albany NY police would tell the drug dealers that plaintiff was the one who called on them, intentionally putting plaintiffs safety in danger. The drug dealers would also use the deli across the street as a base to loiter and sell narcotics. SEE EXHIBIT E110--, in which plaintiff tried to have shut down in which defendants blocked. SEE DISCOVERY D49. The drug detectives in albany told plaintiff if plaintiff wanted their help Plaintiff would have to buy drugs from the drug dealers, in which plaintiff would not buy, police responded, then do not expect their help. SEE DISCOVERY D50, SEE DISPOSITION DS47. The albany new york police officers tried to intimidate plaintiff to move each time plaintiff had to report a incident, demanding that plaintiff move. plaintiff responded to police officers that the drug dealers should move, move to where they live with their activity, and suppose to be arrested on the spot after a called complaint. AFTER plaintiff complained that the drug dealers did not live in the area, some unknown agency or person lured the drug dealers to the side street on clinton street of plaintiffs residence and moved them in some of the houses. SEE EXHIBIT E111, SEE DISCOVERY D51, in which the drug dealers would then show up daily and tell the police they now live on the street. The drug dealers stole \$140 from plaintiff, broke out all of plaintiffs windows in plaintiffs apt causing minor cuts to plaintiff, also a drug dealer throwing a full bottle of water in plaintiffs eye causing swelling and injury in which plaintiff had to seek medical treatment at albany hospital. The drug dealers also menaced plaintiff several times with their guns they obtained. Local police in albany ny and the unknown how many named defendants conspired to intentionally force plaintiff out of apt in which plaintiff would become homeless, and disrupt plaintiff from stopping the defendants embezzling plaintiffs companies. One or more of the defendants or co-defendants conspired harm, to get the drug dealers to murder plaintiff in a scheme to defraud plaintiff and plaintiffs companies. The defendants conduct is of murder for hire. Local police intentionally obstructed justice and state and local law enforcement relating too new york loitering laws. SEE EXHIBIT E112, SEE DISCOVERY D52, SEE DISPOSITION DS48 The defendants also violated plaintiffs privacy and stalked plaintiff to parks multiply times that plaintiff goes to workout causing plaintiff concern for immediate safety. The acts consist of conduct to cause harm to plaintiff, in which plaintiff contacted the DOJ and got 0 response. THE named defendants stopped and would not respond to any of plaintiffs call for assistance in deprivation of plaintiffs right 18 usc 241, 242, retaliation 18 usc, bribery 18usc, stalking 2261a-b, murder for hire 18usc, hate crime 18 usc, extortion under the hobbs act in violation of RICO 1962 (c)(d), SEE EXHIBITS E113, SEE DISCOVERY D54, SEE DISPOSITION DS49.

**24.** Upon information and belief defendants # 74 Tech Valley-FIRST LIGHT of Albany ny ,participated in retaliation acts,and acts to disrupt plaintiff in filing a civil complaint against named defendants , by disabling the internet services to plaintiff in 2015-2018,and disconnecting plaintiffs internet services permantly october 2018, disrupting plaintiff in drafting of complaint that was not finished or filed yet. Defendants act is consistant of bribery 18usc201 ,retaliation 18usc 1513, in violation of RICO 1962 (c) (d)

**25.** upon information and belief defendant Tom Keppler participated in retaliation acts against plaintiff, to disrupt plaintiff in filing a civil complaint ,and intentionally coiercing tenants and local drug dealers to give plaintiff a hard time , telling them he wants her out, in which they would mumble around me, tom wants her out in which one tenant ( who was a unstable prostitute un be known to tenant at time of moving to apt) kept threatening plaintiff with hammer for unknown reason.Plaintiffs windows where broken out by drug dealers loitering in front of building daily for 10-12 hours SEE EXHIBITS 4A, 5A other tenants throwing garbage in front of plaintiffs door, dumped coffee in plaintiffs new air condition. Plaintiff also alledges each time on 3 separate occasions of flat tires on 10 speed bike after defendant Tom Keppler left apt doing repairs in which defendant obviously intentionally flatted the tires of plaintiff for no known reason. Plaintiff also alledges of seeing local police approaching defendant Tom Keppler and both defendants giving plaintiffs dirty looks for unknown reason. Plaintiff alledges of being a decent, clean, stable,reliable,quiet tenant, who has 0 to do with drugs, and has no guests that visit, does not loiter around building,has cleaned in and around the building for owner Tom Keppler for nothing ,just to keep it clean, and who does not have a superintendant there, and does not clean around the building or in the building. Plaintiff also alledges of renting apt in 2013 after answering ad studio for rent on craigslist. Plaintiff alledges rent is \$375.00 and plaintiff has been over paying owner \$400 cash payments , since 2015 a extra \$25 each month just to be a reliable tenant. The over payments amount to \$1,200 . Plaintiff alledges of defendant aggressively harassing plaintiff to move out of apt ,of refusing to give a rent receipt after cash payment oct 2018,and returning about \$60-\$80 telling plaintiff to move. Plaintiff also alledges of defendant then claiming plaintiff did not pay oct 2018 and refused to accept any check from plaintiff for November 2018 after plaintiff told owner oct 18 2018 that rent checks would be mailed to his address from now on. Defendant also refused to accept any dss payment defendant claimed plaintiff did not pay oct 2018 after giving plaintiff a eviction letter for non payment on oct 18 , 2018 after plaintiff contacted housing code to have owner Tom Keppler turn gas -heat on ,and fix broken window in which plaintiffs apt was broken in twice, which then plaintiffs tires on bike were flat after owner Tom Keppler left apt in which was the third incident of tires being flatted after he left apt.Plaintiff also alledges 1<sup>st</sup> repair cost \$40,2<sup>nd</sup> repair cost \$140,and third repair \$140 totaling \$320 of tire damages. Defendant owner of apt house has been overpaid \$1,200 in rent , as of November 2018 refuses to accept in rent from plaintiff to force plaintiff out of apt into the streets to be homeless,in which defendant filed a non payment eviction in which he refuses to accept rent payments which makes

the filed non payment for rent void. Defendant is participating in two counts of retaliation , in which the ny state 223-b prohibits eviction after 6 months of filing a housing code complaint . The defendant filed eviction on behalf of the albany ny defendants in violation of 18usc1511, 18usc ,bribery 18usc ,in violation of RICO 1962 (c)(d)



**CASE STATEMENT DETAILED; PREDICATE ACTS ,CAUSE OF ACTION ,  
RICO STATUTE VIOLATIONS- BY\_  
PARAGRAPH**

**1.**

- 1 INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18 USC 1951 -1952
2. COMPUTER FRAUD 18 USC1029 ,1030 a,1,7
3. SCHEME TO DEFRAUD 18 USC 1346
4. WIRE FRAUD 18 USC 1343
5. MAIL FRAUD 18 USC 1341
6. COMMON LAW TRADEMARK INFRINGEMENT UNDER 43a 1125
7. UNFAIR COMPETITION UNDER 43a 1125 (A)(D)
8. FALSE DESIGNATION OF ORIGIN UNDER 43 a1125
- 9.ECONOMIC ESPIONAGE 18 USC 1831
- 10.CYBERSTALKING 2261A ,B
- 11.RACKETEERING 1961
12. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
- 13 .RICO 1962 ( a) (b) (c) (d)

**A-B**

- 1.INTERFERENCE WITH INTERSTATE COMMERCE 18 USC 1951
2. UNFAIR COMPETITION UNDER 43 a1125
3. COMMON LAW TRADEMARK INFRINGEMENT UNDER 43 a 1125
4. FALSE DESIGNATION OF ORIGIN 43 a1125
5. CYBERSTALKING 2261A -B
6. SCHEME TO DEFRAUD 18 USC 1346
7. WIRE FRAUD 18 USC 1343
8. COMPUTER FRAUD 18 USC 1029,1030a,7
9. ECONOMIC ESPIONAGE 18 USC1831
10. RACKETEERING 1961
- 11.EXTORTION UNDER THE HOBBS ACT 18 USC 1959
12. RICO 1962 (a)(b)(c)(d)

**2**

1. COMMON LAW TRADEMARK INFRINGEMENT 43 (A) 1125
2. UNFAIR COMPETITION 43a 1125
3. FALSE DESIGNATION OF ORIGIN 43 a 1125
4. WIRE FRAUD 18 USC 1343
5. MAIL FRAUD 18 USC 1341
6. SCHEME TO DEFRAUD 18 USC 1346
7. RACKETEERING 1961
8. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
9. ECONOMIC ESPIONAGE 18 USC 1831
10. CYBERSTALKING 2261A,2261B
- 11.RICO 1962 (A)(B)(C)(D)

**A**

1. CYBERSTALKING /STALKING 2261A -B
3. COMMON LAW TRADEMARK INFRINGEMENT 43 a 1125
4. EMBEZZLEMENT 18 USC
5. FALSE DESIGNATION OF ORIGIN 43 a 1125
6. SCHEME TO DEFRAUD 18 USC 1346
7. WIRE FRAUD 18 USC 1343
8. MAIL FRAUD 18 USC 1341
9. ECONOMIC ESPIONAGE 18 USC 1831
10. EXTORTION UNDER THE HOBBS ACT 1959
11. RICO 1962 (A)(B)(C)(D)

**3-3A**

1. CYBERSQUATTING 43 a 1125
2. COMMON LAW TRADE MARK INFRINGEMENT 43 1125
3. FRAUD 18 USC 1064 43 a 1125
4. EMBEZZLEMENT 18 USC
5. FALSE DESIGNATION OF ORIGIN 43 a 1125
6. INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18 USC 1951
7. CYBERSTALKING 2261A -B
8. SCHEME TO DEFRAUD 18 USC 1346
9. WIRE FRAUD 18 USC 1343
10. MAIL FRAUD 18 USC 1341
11. RACKETEERING 1961
12. ECONOMIC ESPIONAGE 18 USC 1831
13. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
14. RICO 1962 (A) (B) (C) (D)

**4**

1. CYBERSTALKING 2261A-B
  2. FALSIFYING RECORDS
- A-C-
1. COMMON LAW TRADE MARK INFRINGEMENT 43 a 1125
  2. FALSE DESIGNATION OF ORIGIN 43 a 1125
  3. UNFAIR COMPETITION 43 a 1125
  4. CYBERSTALKING/STALKING 2261 A -B
  5. SCHEME TO DEFRAUD 18 USC 1346
  6. WIRE FRAUD 18 USC 1343
  7. MAIL FRAUD 18 USC 1341
  8. RACKETEERING 1961
  9. EMBEZZLEMENT 18 USC
  10. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
  11. RICO 1962 (A)(B) (C) (D)

**5**

1. CYBERSTALKING 2261A-B
2. COMMON LAW TRADEMARK INFRINGEMENT 43 a 1125
3. FALSE DESIGNATION OF ORIGIN 43 a 1125
4. UNFAIR COMPETITION 43 a 1125

5. SCHEME TO DEFRAUD 18 USC 1346
6. WIRE FRAUD 18 USC 1343
7. MAIL FRAUD 18 USC 1341
8. INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18 USC 1951
9. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
10. RACKETEERING 1961
11. RICO 1962 (A)(B)(C)(D)

**6**

1. CYBERSTALKING 2261A -B
2. CYBERSQUATTING 43 a1125
3. UNFAIR COMPETITION 43a1125
4. COMMON LAW TRADEMARK INFRINGEMENT 43a1125
5. FALSE DESIGNATION OF ORIGIN 43a 1125
6. INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18 USC1951
7. SCHEME TO DEFRAUD 18 USC 1346
8. COMPUTER FRAUD 1029 ,1030 A,1,7
9. WIRE FRAUD 18 USC 1343
10. MAIL FRAUD 1341
11. ECONOMIC ESPIONAGE 18 USC 1831
12. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
13. RACKETEERING 1961
14. RICO 1962 ABCD

**7**

**A-B**

1. CYBERSTALKING /STALKING 2261A -B
2. COMPUTER FRAUD 18 USC 1029,1030a,1,7
3. INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18USC1951
4. SCHEME TO DEFRAUD 18 USC 1346
5. WIRE FRAUD 18 USC 1343
6. MAIL FRAUD 18 USC 1341
7. COMMON LAW TRADEMARK INFRINGEMENT 43a 1125
8. UNFAIR COMPETITION 43a 1125
9. FALSE DESIGNATION OF ORIGIN 43 a 1125
10. EMBEZZLEMENT 18 USC
11. ECONOMIC ESPIONAGE 18 USC 1831
12. EXTORTION UNDER THE HOBBS ACT 1959
13. RACKETEERING 1961
14. RICO 1962 A,B,C,D

**8**

1. CYBERSTALKING /STALKING 2261A-B
2. ECONOMICAL ESPIONAGE 18 USC 1831
3. UNFAIR TRADE PRACTICES 43a1125
4. COMMON LAW TRADEMARK INFRINGEMENT 43a1125

5. FALSE DESIGNATION OF ORIGIN 43 a 1125
6. SCHEME TO DEFRAUD 18 USC 1346
7. COMPUTER FRAUD 18 USC 1029, 1030
8. WIRE FRAUD 18 USC 1343
9. ECONOMIC ESPIONAGE 18 USC1831
- 10.EXTORTION UNDER THE HOBBS ACT 18 USC 1959
11. RACKETEERING 1961
- 12.RICO 1962 A ,B,C,D

**9.**

1. UNFAIR TRADE PRACTICES 43a1125
- 2.FALSE DESIGNATION OF ORIGIN 43a1125
3. SCHEME TO DEFRAUD 1346
4. WIRE FRAUD 1343
5. EXTORTION UNDER THE HOBBS ACT 18USC 1959
6. RIC 1962 (C) (D)

**10.**

1. TRADEMARK INFRIDGEMENT 43a1125
- 2.UNFAIR TRADE PRACTICES 43a1125
3. CYBERSTALKING 2261A-B
4. ECONOMIC ESPIONAGE 18USC1831
5. SCHEME TO DEFRAUD 1346
- 6.WIRE FRAUD 1343
- 7.MAIL FRAUD 1341
- 8.RACKETERIING 1961
9. RICO 1962 (a)(b)(c)(d)

**11-12 -13-14**

- 1.CYBERSTALKING 2261A-B
- 2.COMMON LAW TRADEMARK INFRIDGEMENT 43a 1125
- 3.UNFAIR TRADE PRACTICES 43a 1125
4. SCHEME TO DEFRAUD 18 USC 1346
5. WIRE FRAUD 18 USC 1343
6. MAIL FRAUD 18 USC 1341
7. EXTORTION UNDER THE HOBBS ACT 1959
8. TRAFFICING IN COUNTERFEIT GOODS 18 USC 2320
9. RACKETEERING 1961
10. RICO 1962 A,B,C,D

**15-16**

- 1.CYBERSTALKING /STALKING 2261A -B
- 2.COMMON LAW TRADE MARK INFRIDGEMENT 43 a 1125
3. SCHEME TO DEFRAUD 18 USC 1343
- 4.WIRE FRAUD 18 USC 1343
- 5.MAIL FRAUD 18 USC 1341
- 6.UNFAIR TRADE PRACTICES,FALSE DESIGNATION OF ORIGIN 43a 1125
- 7.COMPUTER FRAUD 18 USC 1029 ,1030 A,1,7
8. TRAFFICING IN COUNTERFEIT GOODS 18 USC 2320
- 9.INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18 USC

1951

10. EMBEZZLEMENT 18 USC
11. ECONOMIC ESPIONAGE 18 USC 1831
12. EXTORTION UNDER THE HOBBS ACT 18 USC 1959
13. RACKETEERING 1961
14. RICO 1962 A,B,C,D

**17**

1. ECONOMIC ESPIONAGE 18 USC 1831
2. COMMON TRADE MARK INFRINGEMENT 43a 1125
3. FRAUD 18 USC 1064 43 a 1125
4. PUBLIC CORRUPTION 18 USC 201
5. UNFAIR COMPETITION 43a 1125
6. CYBERSTALKING /STALKING 2261A-B
7. FALSE DESIGNATION OF ORIGIN 43 a 1125
8. SCHEME TO DEFRAUD 18 USC 1346
9. WIRE FRAUD 18 USC 1343
10. MAIL FRAUD 18 USC 1341
11. COMPUTER FRAUD 18 USC 1029, 1030 a,1,7
12. EXTORTION UNDER THE HOBBS ACT 1959
13. RACKETEERING 1961
14. RICO 1962 A,B,C,D

**18**

A,B,C,D

1. CYBERSTALKING /STALKING 2261A -B
2. COMMON LAW TRADE MARK INFRINGEMENT 43 a1125
3. SCHEME TO DEFRAUD 18 USC 1346
4. WIRE FRAUD 18 USC 1343
5. MAIL FRAUD 18 USC 1341
6. COMPUTER FRAUD 18 USC 1029,1030 A,1,7
7. UNFAIR TRADE PRACTICES 43 a 1125
8. FALSE DESIGNATION OF ORIGIN 43 a1125
9. EMBEZZLEMENT 18 USC
10. ECONOMIC ESPIONAGE 18 USC 1831
11. EXTORTION UNDER THE HOBBS ACT 18 USC 1951
12. RACKETEERING 18 USC 1961
13. RICO 1962 A,B,C,D

**19**

1. CYBERSTALKING/STALKING 2261A-B
2. CYBERSQUATTING 43 a 1125
3. INTERFERENCE WITH INTERSTATE AND FOREIGN COMMERCE 18 USC 1951
4. COMPUTER FRAUD 18 USC 1029 ,1030 a,1,7
5. UNFAIR TRADE PRACTICES 43 a 1125
6. COMMON LAW TRADE MARK INFRINGEMENT 43 a 1125
7. FALSE DESIGNATION OF ORIGIN 43 a1125
8. EXTORTION UNDER THE HOBBS ACT 18 USC 1959

- 9.ECONOMICAL ESPIONAGE 18 USC 1831
- 10.SCHEME TO DEFRAUD 18 USC 1346
- 11.WIRE FRAUD 18 USC 1343
- 12.MAIL FRAUD 18 USC 1341
- 13. RACKETEERING 1961
- 14.RICO 1962 A,B,C,D

**20**

- 1.RETALIATION 18 USC 1513
- 2. CYBERSTALKING/CYBERBULLYING 2261A-B
- 3. UNFAIR TRADE PRACTICES 43 a 1125
- 4. DEFAMATION
- 5. RICO 1962 C,D

**21**

- 1.CYBERSTALKING 2261A -B
- 2. UNFAIR TRADE PRACTICES 43a1125
- 3. CYBERSQUATTING 43a,d1125
- 4. COMMON LAW TRADE MARK INFRINGEMENT 43 a 1125
- 5. SCHEME TO DEFRAUD 1346
- 6. WIRE FRAUD 18 USC 1343
- 7. MAIL FRAUD 18 USC 1341
- 8. EXTORTION UNDER THE HOBBS ACT 18 US 1959
- 9.RICO 1962 A,B,C,D

**22**

- 1.STALKING 2261A-B
- 2. HATE CRIME
- 3.RETALIATION 18USC1513
- 4.BRIBERY 18 USC 201
- 5.EXTORTION UNDER THE HOBBS ACT 18 USC 1959
- 6. MURDER FOR HIRE 18 USC 1958
- 7.RICO 1962 C,D

**23**

- 1.STALKING 2261A-B
- 2.BRIBERY 201
- 3.RET ALIATION 18 USC 1513
- 4.MURDER FOR HIRE 1958
- 5.DEPRIVATION OF RIGHTS 242
- 6.EXTORTION UNDER THE HOBBS ACT 1959
- 7.OBSTRUCTION OF STATE AND LOCAL LAW ENFORCENT
- 8.RICO 1862 C,D

**24**

- 1. BRIBERY 201
- 2. RETLIATION
- 3. RICO 1962 C,D

**25**

- 1. BRIBERY 201
- 2. RETALIATION 18USC1513



3.RICO 1962 C,D

## **SUMMARY OF INJURIES /DAMAGES**

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### **\$91.450 BILLION DOLLARS**

- 1.LOSS IN PROFITS AS OTHER BRAND COMPANIES- \$ 6 BILLION DOLLARS
2. CORRECTIVE ADVERTISING COSTS -\$6 BILLION DOLLARS
3. PRO SE FEE'S,COURT COSTS,COST TO INITIAT LAWSUIT,ATTORNEY'S COST \$ 100 MILLION DOLLARS
4. RELOCATION COSTS \$100 MILLION
5. UNPAID ROYALATIES BY NAMED \$150,000,000 MILLION DOLLARS

### **.....AMOUNT OWED BY EACH NAMED DEFENDANT OF THE \$ 91 .450 BILLION DOLLARS**

- 1.LOSS IN PROFITS AND REVENUE AS OTHER COMPANIES-  
1 COMPANY/ \$ 80 MILLION DOLLARS 2 COMPANIES-\$160 MILLION DOLLARS SINCE DISCOVERY 2015 BY EACH
- 2.CORRECTIVE ADVERTISING COSTS -NATIONWIDE- @ 1MILLION DOLLARS A DAY =\$ 365 MILLION X 3 YEARS OF CORRECT DESTINATION OF ORIGIN SINCE DISCOVERY 2015 =\$ 1.560,000,000 BILLION DOLLARS BY EACH DEFENDANT
- 3.PRO SE COSTS ,AND COST TO BRING THE LAWSUIT ,TRAVELING AND RELATED COURT COSTS,COSTS OF EXPERT WITNESSES AND ATTORNEYS \$ 2.740,000 MILLION DOLLARS BY EACH DEFENDANT
- 4.RELOCATION COSTS \$ 3 MILLION DOLLARS BY EACH DEFENDANT
5. UNPAID ROYALATIES AT @ \$15 MILLION DOLLAR BY EACH NAMED DEFENDANT

LISTS OF EXHIBITS

**CASE STATEMENT**

A. INTRO PAGE-E1,E2,E21,55,E56,E56AE57,E58,E59,E60,E61,E62,E65

B. SEARCH ENGINE DEFENDANTS -

E8,E9,E11,E13,E14,E15,E16,E17,E64,E81,E82,E83,E84,E85,E86

C. COMPETITORS -E46,E47,E49,E50

D. E 72 ( 1-100 )

E. -E87,E88,E89-E51 (1-100 ),E52 ,E53 ( 1-100 )

F. E91 ( 1-100 )

G. E96

H. E95,E104,E105,E106,E107,E108,E113,E114,E115

I. E109,E110,E111,E112

J. E90

K. LIST OF SIMILAR COMPLAINTS

L. LEGAL DEFINITIONS

M. EXPERTS,EXPERT WITNESSES

N. STATE VIOLATIONS EXHIBITS

O. PREDICATE ACT DEFINITIONS

P. E19,E20

Q. E32,E33,E34,E35,E36,E37,E38,E39,E40,E41,E42,E43E44,E45

R. E22,E23,E24,E25,E26,E27,E28,E29,E30

S. EE63,E92,E93,E94,E97,E98,E99,E100,E101,E103,E104

T. E10,E15,E67,

U. DISCOVERIES + DISPOSITIONS

V. CV1,CV2,CV3,CV4

DP DISNEY + PIXAR - E66,E68,E69,E70,E71,DP1,DP2,DP3,DP4,DP5

AEP- .AMAZON,EBAY,PAYPAL -

E73,E75,E76,E77,E78,AM1,AM2,AM3,AM4,AM5,EB1,EB2,EB3,EB4,EB5,PP1,P

P2,PP3,PP4,PP5

CDDC -

CD1,CD2,CD3,CD4,CD4,CD5,CD6,CD7,CD8,CD8,CD9,CD10,CD11,CD12,CD13,CD14,CD15

TIME FRAME TO TRIAL

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1. COMPLAINT FILED /INJUNCTION MOTIONS- REPLY/ ANSWERS - 16 DAYS
2. REPLY/ ARGUMENTS /MOTIONS /DISCOVERY- 26 DAYS
3. MEDIATION /SETTLEMENT CONFERENCE -2 WKS
- 4.TIME FRAME- DISCOVERIES -REQUEST FOR DISCOVERIES /REQUEST FOR PRODUCTION /REQUEST FOR ADMISSION /POSITIONS/ EXPERT WITNESSES 2- 4 MONTHS
5. COURT CONFERENCE - STATUES OF DISCOVERIES /FINAL STATUES/ 3-4 DAYS
- 6.TIME ESTIMATE OF TRIAL 3-4-DAYS, OR 7-20 DAYS
7. TRIAL DATE IN 8 MONTHS. **PLAINTIFF IS PREPARED FOR TRIAL- ( documents , that include evidence from exhibits)**

ADDRESSES

1. LARRY PAGE (CEO GOOGLE, ADSENSE, YOU-TUBE) - 1600 AMPHITHEATER PARKWAY, MOUNTAIN VIEW CA 94043
2. SERGEY BRIN - (CEO GOOGLE, ADSENSE, YOU-TUBE) - 1600 AMPHITHEATER PARKWAY, MOUNTAIN VIEW, CA 9403
3. MARK ZUCKERBERG (CEO FACEBOOK) - 1 HACKERWAY, MENLO PARK, CA 94025
4. DAVID FILO (EX CEO YAHOO) 46 PALO ALTO, CA 94306
5. JERRY YANG (EX CEO YAHOO) 44 LOS ALTOS HILLS, CA 94022
6. MARISSA MAYER (EX CEO YAHOO, CHAIRMAN WALMART) - 165 UNIVERSITY PALO ALTO, CALIFORNIA
7. HANS VESTBERG (CEO OF VERIZON) 226 WEST 45 TH STREET NEW YORK, NY
8. JEFF BEZIO (CEO AMAZON.COM) - 1200 12 TH AVENUE SOUTH SUITE 1200, SEATTLE, WA 98144
9. SATYA NADELLA (CEO MICROSOFT, BING) - 1 MICROSOFT WAY, REDMOND, WA 98052
10. BRAD SMITH (CEO MICROSOFT, BING) - 1 MICROSOFT WAY REDMOND, WA 98052
11. GABRIEL WEINBERG - (CEO GODUCKGO) 20 PAOLI PIKE, PAOLI PENNSYLVANIA 19301
12. DOGPILE - GONET- ?
13. DEVIN WENG - (CEO EBAY, PAYPAL) 2025 HAMILTON AVENUE, SAN JOSE, CA 95125
14. PIERRE OMIDYAN (CEO EBAY, PAYPAL) - 2025 HAMILTON AVENUE, SAN JOSE, CALIFORNIA, CA 95125
15. TIM ARM STRONG (CEO AOL) - 770 BROADWAY NEW YORK, NY 10003
16. BEN SIBERMAN (CEO PINTEREST) 808 BRANNAN STREET SAN FRANCISCO, CA 94103
17. JOEY LEVIN- CEO (ASK, IAC) 55 WEST 18TH STREET NEW YORK, NY
18. JOAN WILSON (CEO UNION SQUARES VENTURES) 915 BROADWAY NEW YORK, NY 10010
19. FRED WILSON (CEO UNION SQUARES VENTURES) 915 BROADWAY NEW YORK, NY 10010
20. AMY CHESHIRE (HEY GORGEOUS) 270 WEST 38TH STREET NEW YORK NY
21. DAVID WECHSLER (HEY GORGEOUS) 270 WEST 38 TH STREET NEW YORK, NY
22. JASON APFEL (CEO FRAGRANCE.NET) 900 GRAND BLVD, DEER



**PARK NEW YORK,NY**

**23. LLOYD PARKS -3250 BROADWAY APT 145 NEW YORK,NEW YORK 10027**

**24. MICHAEL LOGAN -3250 BROADWAY APT 145 NEW YORK,NEW YORK 10027**

**25. GRES MAFFEI - 1 HSN STREET,PETERSBURGH ,FLORIDA 33716**

**26. JOHN MALONE ( CEO HSN ) - 1 HSN ST. PERTERSBURGH ,FLORIDA 33716**

**27. AJAY SINGH -GORGEOUS FOREVER**

**28. LES WEXNER - ( CEO VICTORIA'S SECRET ) THREE LIMITED PARKWAY ,COLUMBUS ,OHIO 43230**

**29. DAVID MCCONNELL- OF AUSTRILAN ( GORGEOUS COSMETICS ) 8616 LA TIJERA BOULEVARD ,LOS ANGELES ,CA 90045**

**30. KIM KARDASHIAN WEST-**

**31. KYLE KARDASHIAN**

**32..DOUGLAS MCMILLION - ( CEO WALMART )702 WEST EIGHTH STREET BENTONVILLE ,ARKANSAS 72716**

**33.KANYE WEST-**

**34..HELEN GIBSON - CEO HELLO GORGEOUS ) 1829 CORDOVA ROAD -17TH STREET CAUSEWAY ,FORT LAUDERDALE , 33316**

**35.DOMENICO SOLE (CEO GUCCI )-50 HARTE WAY SECAUCUS ,JERSEY CITY,NJ 21030**

**36. CHRIS DE LAPUENTE ( CEO SEPHORA ) 525 MARKET STREET ,FIRST MARKET TOWER FLOOR 36 ,SAN FRANCISCO ,CA 94105**

**37. SALLY HERSHBERGER ( CEO GET GORGEOUS SALLY HERSHBERGER )25 WEST 26TH STREET 2ND FLOOR NEW YORK ,NY**

**38.DAVID TAYLOR, MICHELE SCANNAVINI ( EX -CEO COTY )- 350 5TH AVENUE ,17 TH FLOOR NEW YORK,NY 10018**

**39. GORGEOUS COUTURE -(CEO) LTD POBOX 701 SAN MATEO CALIFORNIA 94401**

**40. GORGEOUS ANTIQUES (CEO) 467 DELAWARE AVENUE ALBANY NY 12208**

**41.ABIDALI NEEMUCHWATA ( CEO YARDLY ) 3030 1114 6TH AVENUE NEW YORK ,NY**

**42 . MATTHEW FARRELL ( CEO VITAFUSION )-500 CHARLES,EWING BLVD ,EWING N.J. 08628**

**43. BLAKE NORSTORM ( CEO NORSTORM) - 1600 SEVENTH AVENUE SUITE 2600 SEATTLE, WA 98101**

**44. DICK COSTOLO ( CEO TWITTER )- 1355 MARKET STREET SAN**

**FRANCISCO ,CA 94103**

45. BOB MARINO (CEO CAFEPRESS ) - **11909 SHELBYVILLE ROAD, LOUISVILLE ,KENTUCKY 40243**
46. FRED DURHAM ( CEO CAFE PRESS ) - **11909 SHELBYVILLE ROAD LOUISVILLE,KENTUCKY 40243**
47. ZAZZLE- ROBERT BEAVER **1800 SEAPORT BOULEVARD REDWOOD CITY ,CA 94063**
48. INSTAGRAM- KEVIN SYSTROM- **200 JEFFERSON DRIVE MENLO PARK ,CA 94025**
49. YELLOW PAGES - (CEO JARED ROWE) -**247 NORTH LAKE PKWY ,GA 30084**
50. BOB IGER DISNEY -**500 S. BUENA VISA STREET ,BURBANK ,CA 91521**
51. PETER DOCOR -PIXAR - **1200 PARK AVENUE EMERYVILLE ,CA**
52. LG ENTERPRISES- **201 JAMES RECORD RD, HUNTSVILLE ,ALABAMBA, 35824**
53. VOSTOK EUROPE WATCHES - VILNIUS KOLIZ -**VYTENIO STR22 LY-03229 VILNIUS ,LITHUANIA ; EMAIL info @votok -europe.com**
54. VOSTOK EUROPE WATCHES- KOLIZ VOSTOC - **VYTENIO STR.22 ,LT -03229 VILNIUS ,LITHUANIA +370 52 10 6342**
55. JEAN PIGOZZI - **1 WEST 67 TH STREET STE NEW YORK ,NY 10023**
56. KD WAVE- **1 WEST 67 TH STREET STE 901 NEW YORK ,NY 10023**
57. LIMOSANDLIQUOR - BEN BROWN -**PITTSBURGH ,PENNSYLVANNIA ?**
58. ZIMZILLA - **70 BLANCHARD RD BURLINGTON ,MASSACHUSETTS 01803**
59. BIG CARTEL -MATT WIGHAM,ERIC TURNER -**362 WEST PIER POINT AVENUE ,SALT LAKE CITY , UTAH 84101**
60. RED BUBBLE- BARRY NEWSTEAD, MARTIN HOSKING - **-111 SUTTER STREET 17TH FLOOR ,SAN FRANCISCO ,CA 94104**
61. REDARTISM - ?
62. FRITZ LIMO-GERMANY-?
63. (LIMO SUN CEO) - **GAOSHA INDUSTRIAL COMPLEX BUILDING ,2A Z HONGCUN STREET ,PANYU ,DISTRICT GUANGZHOU CHINA 511400**
64. (GORGEOUS GIRL COSMETICS CEO )- **6776 SOTHWEST FREEWAY # 530 HOUSTON TEXAS ,77036**
65. PENNY PRITZER- **300 N. LASALLE STREET SUITE 1500 ,CHICAGO, ILLINOISE**
66. REBECCA BLANK-**161 BASOM HALL 500 LINCOLN DRIVE MADISON ,WI 53706**
67. WILBUR ROSS - **HERBERT C. HOOVER BUILDING ,1401 CONSTITUTION AVENUE ,NW, WASHINGTON DC 20230**

68. MICHAEL BLOOMBERGE -**731 LEXINGTON AVENUE ,NEW YORK,NY 10022**
- 69.KATHLEEN SHEEHAN - ( ALBANY, NY MAYOR ) **24 EAGLE STREET ALBANY ,NY 12208**
70. ROBERT SEARS ( ALBANY NY EX POLICE CHIEF ) **165 HENRY JOHNSON BLVD ALBANY ,NY 12210**
71. STEVEN KROKOFF -2006 HERITAGE WALK ,MILTON ,GA 30004 (ALBANY NY EX - POLICE CHIEF)
- 72.BRENDAN COX ( ALBANY NY EX POLICE CHIEF ) 165 HENRY STREET ALBANY NY 12210
73. DERRICK SCHULTZ ( ALBANY NY ) POLICE OFFICER - **165 HENRY JOHNSON BLVD 12210**
74. KURT VAN WAGENEN ( CEO -TECH VALLEY-FIRST LIGHT )- 41 STATE STREET ALBANY NY 12207
- 75.TOM KEPPLER- 588 ELM AVENUE , SELKIRK ,NY 12158
76. GO DADDY - (CEO SCOTT WAGNER) - **14455 N. HAYDEN RD,SUITE 226 SCOTTSDALE,ARIZONIA 85260**
77. ENOM- SEAN MORIARTY - **58808 LAKE WASHINGTON BLVD ,NE 300 KIRKLAND ,WA 98033**
78. ENOM -ELLIOT NOSS **5808 LAKE WASHINGTON BLVD , NE 300 KIRKLAND ,WA 98033**
79. DAVID BROWN (CEO NETWORKSOLUTIONS) - 505 HUNTMAN DR,HERNDON,VIRGINIA,JACKSONVILLE ,FLORIDA
80. JAMIE DIMON ( CEO CHASE BANK ) 270 PARK AVENUE FLOOR FLOOR 12 NEW YORY ,NY 10017
81. NAME.COM( CEO)- 414 14TH STREET # 200, DENVER,COLORADO 80205
82. NAMESILO.COM- (CEO)1300 E. MISSOURI AVENUE ,SUITE 110 PHOENIX ,ARIZONIA
- 83.HUGEDOMAINS.COM CEO JEFF REBERRY AND ANDREW BERRY - **2635 WALNUT STREET DENVER ,COLORADO 80205**
- 84.DYNADOT,LLC - TODD HAN **PO BOX 701 ,SAN MATEO,CALIFORNIA 94401**
- 85.DROPCATCH.CO -2635 WALNUT STREET ,DENVER COLORADO 80205
- 86.FASTDOMAIN -JEFF 1500 N PRIEST DR,SUITE 200 TEMPE ,ARIZONIA 85281
- 87.DOMAILLOCAL (CE0 )-
- 88.ASICO TECHNOLOGIES (CE0)-
- 89.HOSTGATOR
- 90.TUCOWS- (CEO ELLIOT NOSS )5808 LAKE WASHINGTON BLVD NE #

201 KIRKLAND WA 98033

91. REBEL CORP - ROB VILLENEUVE (CEO)-

92. 123 REG LIMITED -

93. NAMESAY LLC- 2635 WALNUT STREET DENVER COLORADO 80205

94. WILD WEST DOMAIN - (CEO SCOTT WAGNER) 14455 NORTH HAYDEN  
ROAD ,SUITE 226 SCOTTSDALE ARIZONIA 85260

95. CSC CORPORATION -(CEO -BRUCE WINN) -251 LITTLE FALLS DRIVE  
WILMINGTON ,DE 19808

96. 1 AND 1 INTERNET AG- ( CEO ACHIM WEISS ) 701 LEE RD. SUITE 300  
CHESTERBANK PA 19087

97. LAUNCH PAD